

Design Guide
for Travellers' Sites
in Northern Ireland

May 2019

Index

PAGE NO.	
5	Introduction
5	Purpose
5	Background
7	Planning Policy Context
10	Scope <ul style="list-style-type: none"> • Serviced Site • Transit Site • Emergency Halting Site
12	SERVICED SITES
12	The Site
12	Site Location/Selection
13	Relationship to Surrounding Land Use
14	Health & Safety Considerations
15	Good Relations
15	Scheme Design
17	Sustainability
17	Site Licences for Travellers' Sites
18	Site Design
18	Size and layout of the site
20	Site Boundaries
21	Size of pitch
23	Layout of Pitches
23	Orientation of Pitches
24	Site Access and Roadways
25	Access for Emergency Vehicles
26	Children's Play Area
27	Car Parking
27	Site Security
28	Landscaping
29	Hard Standing
30	Site Facilities
30	Amenity Building
32	Other on site facilities
33	Lighting
34	Postal Arrangements
34	Waste Disposal
35	Space for Work and Animals
35	Office Premises

36	Site Services
36	Scope to provide essential services
36	Water Supply
36	Electricity Supply
37	Connection Points
37	Gas Supply
37	Oil fired Central Heating
38	Drainage
38	Sewerage
40	Health, Safety and Accessibility
40	Risk Assessment
40	Fire Safety
41	Emergency Telephone
41	Accessibility
42	TRANSIT SITES
42	The Site
42	Site Location/Selection
42	Relationship to Surrounding Land Use
42	Health & Safety Considerations
43	Site Design
43	Number of pitches
43	Site Boundaries
43	Size of pitch
43	Layout of pitches
43	Orientation of pitches
43	Site Access and Roadways
43	Access for Emergency Vehicles
43	Emergency Telephone
43	Car Parking
43	Site Security
43	Landscaping
43	Hard Standing
44	Site Facilities
44	Private Amenities
44	Lighting
44	Waste Disposal
44	Sluice
44	Laundry Facilities
44	Space for Work and Animals
44	Site Services

44	Water Supply
44	Electricity Supply
44	Gas Supply
44	Drainage
44	Sewerage
45	Health and Safety Considerations
45	Risk Assessment
45	Fire Safety
45	Accessibility
46	EMERGENCY HALTING SITES
46	The Site
46	Site Location/Selection
46	Site Layout, Access and Orientation
46	Site Facilities and Services
47	Health and Safety Considerations
48	CONSULTATION
48	Introduction
49	When to consult?
49	Methods of consultation
51	Feeding back on the results of consultation
51	Consulting with the settled community
52	Management Standards
55	Annex A – Key Documents

Introduction

Purpose

- i. This guide is intended to support the provision of appropriate, cost effective facilities for Travellers living in Northern Ireland. It seeks to outline the key issues, including the relevant planning context, that could be considered and identify the main design and management elements necessary to create high quality and sustainable Traveller sites which meet residents' traditional and cultural needs. However the issues are complex and there is no single 'one size fits all' Travellers' site.
- ii. It is therefore not the intention of this guide to impose uniform solutions. Decisions around the provision of Traveller sites should be taken on a case by case basis taking into account local circumstances such as the development requirements, geographical and other characteristics of the site (or potential site). For this reason it is recommended that early and regular consultation with all relevant stakeholders is a crucial element in getting the design right from the outset.
- iii. The previous *Design Guide for Travellers' Sites in Northern Ireland* was published by the Department of the Environment for Northern Ireland (DOE (NI)) in 1997. Since then there have been a number of developments including the transfer of all Council owned services sites to the Housing Executive. This new version of the guide has been produced to reflect those changes.

Background

- iv. In 1999 the DOE *New Policy on Accommodation for Travellers* recommended that the Northern Ireland Housing Executive (NIHE) be given the strategic role and responsibility for the provision of accommodation for Travellers. This included the transfer of all existing district council owned serviced sites to the Northern Ireland Housing Executive (NIHE).

- v. The Housing (Northern Ireland) Order 2003 provided the legislative framework to allow for the transfer from district councils to the NIHE of all sites/land in receipt of funding in the form of a government grant either for the acquisition or the development of land for Traveller accommodation. On 1st December 2003 a number of sites/lands were transferred to NIHE under the Order from the following former District Councils: Strabane, Belfast, Derry, Omagh and Dungannon.

Travellers' Accommodation Needs Assessment

- vi. As the Regional Housing Authority for Northern Ireland, NIHE has strategic responsibility for providing Travellers' Accommodation. In delivering the Traveller Accommodation Programme, the NIHE has worked to improve the range of accommodation options available and continues to work with partner agencies, regionally and locally to reduce the inequalities experienced by Travellers.
- vii. Travellers' distinctive needs are assessed as part of the local housing needs assessment undertaken by the NIHE. In 2002 the NIHE completed the first comprehensive assessment of the accommodation needs of all Traveller households in Northern Ireland. Subsequent assessments were published in November 2008 and March 2015, and a new assessment is currently under development. <https://www.nihe.gov.uk/index.htm>
- viii. Travellers require decent, culturally sensitive accommodation which provides meaningful choice for households regarding their way of life.¹ In order to support this aim the NIHE develops a programme of Traveller-specific schemes each year in consultation with Traveller families and the wider community to address identified priority need and taking into account factors such as land availability and compatibility.

¹ Outlining Minimum Standards for Traveller Accommodation, Equality Commission for N.I. (ECNI) (2009), page 9.

Planning Policy Context: The Northern Ireland Planning System

- ix. In April 2015, the Northern Ireland planning system was reformed and restructured from a unitary system where all planning powers rested with the Department of the Environment (DOE), to a new two-tier model of delivery whereby the eleven local councils have primary responsibility for the implementation of the following key planning functions:
- local plan-making;
 - development management (excluding regionally significant applications) and;
 - planning enforcement.
- x. The DOE retained responsibility for regional planning policy, the determination of regionally significant and called-in applications and planning legislation. It also provides oversight, guidance for councils, governance and performance management functions. These DOE responsibilities were transferred to the new Department for Infrastructure (DfI) in May 2016 and are aligned with the former Department for Regional Development's existing regional planning responsibilities as set out in the *Regional Development Strategy 2035*.
- xi. *DfI's **Regional Development Strategy 2035 (RDS)***, published in 2012, guides the future development of Northern Ireland to 2035 and is the spatial strategy of the Executive.² It provides an overarching strategic planning framework to facilitate and guide the public and private sectors. The RDS addresses economic, social and environmental issues aimed at achieving sustainable development and social cohesion. It has a statutory basis and all planning policy and guidance prepared by central government must be in general conformity with the RDS.

² <https://www.infrastructure-ni.gov.uk/publications/regional-development-strategy-2035>

- xii. Local Development Plans currently being prepared by councils must also take account of the RDS. Its vision is for “An outward-looking, dynamic and liveable Region with a strong sense of its place in the wider world; a Region of opportunity where people enjoy living and working in a healthy environment which enhances the quality of their lives and where diversity is a source of strength rather than division.”
- xiii. In September 2015, DfI's **Strategic Planning Policy Statement (SPPS)** was published in final form. This sets out the Department's regional planning policies for securing the orderly and consistent development of land in Northern Ireland under the reformed two-tier planning system. The provisions of the SPPS must be taken into account in the preparation of Local Development Plans, and are also material to all decisions on individual planning applications and appeals.
- xiv. The SPPS does not seek to restate policy or guidance that is expressed elsewhere within other relevant government strategies or policies.
- xv. The relevant Strategic Planning Policy for Travellers Accommodation as set out in the SPPS is reproduced below;

Traveller Accommodation

6.144 Travellers have distinctive needs which will be assessed as part of the local HNA/HMA. Where the HNA/HMA identifies a demonstrable need for Travellers specific accommodation, planning permission will be granted for a suitable facility to meet this need. This may be provided through a grouped housing scheme, a serviced site or a transit site, subject to meeting the following criteria:

- adequate landscaping being provided;
- the development being compatible with existing and proposed buildings and structures in the area paying particular regard to environmental amenity; and
- Where appropriate, the provision of workspace, play space and visitor parking being provided.

6.145 Where a need is identified and a development plan is under preparation, this should identify a suitable site(s).

6.146 Where a need is identified for a transit site or a serviced site, which cannot readily be met within an existing settlement in the locality, proposals will be required to meet the policy requirements in respect of rural planning policy for social and affordable housing.

- xvi. In addition it is important to note that PPS12: (Housing in Settlements) – Policy HS 3 (Amended) 'Travellers' Accommodation 2013') will also apply during a transitional period whilst a council brings forward a Plan Strategy for their area (See Paragraphs 1.10-1.12 of the SPPS).
- xvii. With the introduction of the new two-tier planning system on 1 April 2015, councils now have the power to allocate housing land to facilitate the 'right' mix of housing tenures for their own plan area including open market and special housing needs such as Travellers' accommodation. Councils will bring forward detailed operational planning policies for inclusion within their **Local Development Plans**, tailored to local circumstances. In doing so, councils must take account of the provisions of the SPPS.

- xviii. It is ultimately a matter for a Council as the planning authority to determine individual planning applications for 'Travellers' Accommodation' on a case by case basis, taking into account all relevant material planning considerations, including the provisions of the local development plan, regional planning policy, the characteristics of the site and the Design Guide for Travellers' Sites NI . The relevance and weight given to material considerations is a matter of planning judgement for the planning authority.

Scope of the Guide

- xix. This guidance is primarily intended to apply to caravan sites for Travellers (as defined under the Caravans Act (Northern Ireland) 1963 as amended by the Caravans Act (Northern Ireland) 2011)³ and addresses the three site categories⁴ listed below:
- **Serviced Site**
 - **Transit Site**
 - **Emergency Halting Site**
- xx. **A Serviced Site** is a range of managed accommodation where Traveller families have a permanent base to park their caravan or erect a structure as defined within the Caravans Act; where electricity, water and sewerage are provided and where other facilities such as communal or individual amenity buildings must be provided.
- xxi. **A Transit Site** is a permanently operational facility with similar facilities to serviced sites where Travellers may park their caravans on a temporary basis and where electricity, water and sewerage services are provided. They are not intended for use as a permanent lease for an individual household.

³ Definition - The definition of caravan can include mobile homes, park homes and timber framed sectional buildings if they fall within the description given under Part 4, section 15 of The Act.

⁴ These are the categories as used by NIHE and Planning Authorities. Elsewhere a 'Serviced' Site is sometimes referred to as a 'Permanent' site and the 'Emergency Halting Site' is sometimes referred to as a 'Temporary Stopping Place'.

- xxii. **An Emergency Halting Site** is a temporary (less than 28 days) place to park with appropriate facilities managed under Co-operation Policy⁵ principles. They may not require planning permission if they are in use for fewer than 28 days.
- xxiii. A fourth type of accommodation for Travellers is Group Housing Schemes. Group Housing is developed through the Social Housing Development Programme (SHDP). The specifications for these developments are comparable to that provided for the settled community and covered under guidance provided by the Department for Communities (DfC) Design Standards and Planning and Building Control regulations. Specific requirements such as layout or caravan parking for group housing should be determined by consultation throughout the design process with prospective residents and their families in line with the guidance in this document.
- xxiv. This guidance should be considered in the development of new sites and for sites that have to be substantially redeveloped.

⁵ In Northern Ireland, the Co-operation Policy, managed by the NIHE, allows camping on a temporary basis. It is a way of dealing with a humane requirement rather than an alternative to the permanent sites or transit sites. Once the co-operation policy is in place for a given site, Travellers are allowed to remain, subject to a number of conditions. Further details can be found on the NIHE website.

Serviced Sites

The Site

Site Location / Selection

1. Selecting the right location for a site is a key element in supporting good community relations and maximising its success. As with any other form of housing, poorly located sites will have a detrimental effect on the ability of residents to:

- Seek or retain employment;
- Attend school, further education or training;
- Obtain access to health services and shopping facilities.

Principles

2. Sites should have safe and direct access onto a public road with reasonable proximity to major roads and public transport services.
3. Where possible, sites should be located within a reasonable distance to local schools, shops, medical services, parks, places of worship and community facilities. Sites should be located where services (e.g. drainage, water supply, electricity, telephone, etc.) are available or can be provided for reasonable cost.
4. Easy access to essential services and facilities promote social contact with other residents in the settled community therefore encouraging a greater sense of community with shared interests.
5. It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places as this could have a negative impact on the general health and well-being of residents and pose safety risks particularly for young children. All prospective site locations should be considered carefully before any decision is taken to proceed to ensure that the health and safety of future residents is not at risk. It should also provide privacy and have

characteristics which are sympathetic to the local environment. When selecting locations for permanent sites consideration needs to be given to the fact that children will be on the site.

6. Sites should not normally be identified for Traveller use in locations that are inappropriate for ordinary residential dwellings. Exceptions can be considered if for example the location is unsuitable for housing for practical or technical reasons, and the health and safety of the Traveller is not compromised. If the site is sustainable and is supported by the Travellers and the wider community exceptions may apply in the following circumstances:
 - Prospective residents are happy to live in the location;
 - Existing land is available to meet immediate need on a short term interim basis pending a longer term solution;
 - Land is suitable for low level single storey development but not for multi storey construction requiring deeper foundations.
7. In such cases prospective residents should be made aware of these exceptional circumstances at the outset.

Relationship to Surrounding Land Use

8. Consideration must be given to the relationship of sites with the surrounding settled community. For this purpose it is important to ensure that proposals to develop a site are compatible with broader strategies in place for improving community cohesion. The site must be sustainable, offering scope to manage an integrated coexistence with the local community. This will include consideration of noise and possible disturbance to Travellers living on the site and possible noise and disturbance to the wider community, in particular from movement of vehicles.
9. Many Travellers express a preference to live in a rural location on the edge of, or closely located to, a large town or city consistent with their traditional lifestyles and means of employment. Sites adjacent to light industrial areas therefore tend not to be popular because of their isolation, distance from local facilities and safety risks due to poor lighting.

Health and Safety Considerations

10. A site survey and investigation should be undertaken in all cases to identify possible problems, e.g. waterlogging, flooding, landfill, contamination, etc.
11. Sites must be located on land that has been properly decontaminated. If contamination is present remedial work should only be undertaken by approved contractors in accordance with relevant standards to ensure the contamination has been remedied to the standard on which housing development would take place. These processes can be prohibitively expensive and should be considered only where the development is financially viable.
12. Previously used sites may be suitable; however the standard of appraisal should reflect the standards for conventional residential housing. For example, sites adjacent to a rubbish tip, on landfill sites, close to electricity pylons or any heavy industry are unlikely to be suitable.
13. When considering sites adjacent to main roads, flyovers and railway lines, careful regard must be given to:
 - The health and safety of children and others who will live on the site; and
 - The greater noise transference through the walls of caravans than through the walls of conventional housing and the need for design measures (for instance noise barriers) to abate the impact on quality of life.
14. The proposed site must be relatively flat and suitable for purpose. Sites should not be developed on exposed sloping sites where there is risk of caravans being overturned.

Good Relations

15. Sites should support harmonious relations, both within the Traveller community and between Travellers and the settled community. Research by Equality Commission for Northern Ireland (ECNI) (*Outlining Minimum Standards for Traveller Accommodation*) has highlighted the issue of compatibility as a key success factor in developing sites. In some instances it will not be possible to place Traveller families in close proximity to each other, and in such cases, early engagement and meaningful consultation with Travellers is critical. Design of the site is important here as, for example, it may be possible to have separate entrances for use by different families.

Scheme Design

16. Following site identification and investigation there are a number of factors that will need to be taken into account when creating a design brief for the site. Where possible the physical layout of the site should take into consideration the specific preferences of site residents. These factors include:

- Consultation with and between the Traveller and settled communities;
- Number of family groups to be accommodated;
- Average family size and range of family sizes;
- Relations between family groups;
- Desire of Travellers to settle;
- Desire of Travellers to have community facilities provided;
- Attitude towards integration with the settled community;
- Planning considerations and the design approach including any special requirements of the relevant planning authority affecting layout and development;

- Appropriate architectural treatment, which should seek to produce a design of character;
- The number of pitches and the size of the site;
- Provision for open space, play areas, work areas, community facilities, landscaping and grazing;
- Any special considerations regarding accessibility in the design of buildings and facilities;
- Provision for management of the site;
- Obtaining scheme approval and planning permission from the relevant council/ planning authority;
- Adherence to Northern Ireland Building Regulations;
- Statutory obligations under the Health and Safety Regulations, Fire Regulations, Construction (Design and Management) Regulations, etc;
- Access issues;
- Cost parameters; and
- Environment and aesthetics of the land to be developed.

17. The preferred design option must be derived from a robust needs assessment and an economic appraisal of the range of possible options for a particular site and group of Travellers, taking into account feasibility and value for money.

18. With regards design standards it is also recommended that peer groups are created with existing site occupants, are created for the purposes of providing design reviews at an early stage when provision is being considered and also prior to a planning applications being submitted.

Sustainability

19. Sites should be developed so that they:

- promote peaceful and integrated co-existence between the site and the local community;
- promote, in collaboration with commissioners of health services, access to appropriate health services;
- ensure that children can attend school on a regular basis;
- provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any Travellers that may locate there or on others as a result of new development;
- avoid placing undue pressure on local infrastructure and services;
- do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans;
- reflect the extent to which traditional lifestyles (whereby some Travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Site Licences for Travellers' Sites

20. In the main, traveller sites provided by NIHE, Housing Associations or private sites will require a site licence as they are providing space for a caravan which travellers considers to be their permanent residence. The length of stay on a particular site is irrelevant. The only exception to this is where a temporary site is provided as an emergency halting stop for 1 or 2 nights. Planning permission must be obtained for a caravan site before a licence can be applied for with the Local Council. Under Model Licence Conditions the Local Council may apply

conditions on the licence. Failure to hold a Site Licence or breaking any licence conditions is an offence which can incur a fine.

Site Design

Size and layout of the Site

21. Ultimately it is a matter for the local council as the planning authority to determine the appropriateness of the 'Site Design' taking into account the relevant local development plan, planning policy, local circumstances and all other material planning considerations.
22. When designing the layout of a site careful consideration must be given to the health and safety of residents and in particular children. The need for separate vehicular/pedestrian access should also be considered.
23. It is important to ensure that traffic calming measures are considered for all sites. Care should be taken when introducing speed humps and other measures to ensure that appropriate drainage is accommodated within the scheme to allow for the effective passage of surplus water.
24. Clear and effective signage should be introduced where a speed restriction or other traffic calming measure is to apply. Similarly, clear directions should be in place to indicate the location of hydrants and other access points for the fire service when attending an emergency on site. Signage should be in graphical form in addition to the written word.
25. For practical reasons, caravan sites require a greater degree of land usage per household than for a houses with the same footprint. Traveller sites are designed to provide land per household which is suitable for a caravan as defined within the Caravans Act (Northern Ireland) 1963 as amended the Caravans Act (Northern Ireland) 2011 and an amenity building together with space for parking. Sites of various sizes, layouts and pitch numbers operate successfully and work best when they take account of the size of the site and the needs and demographics of the families that reside on them. Sites where pitches are in a linear form or in "tree

branch" form may be a preference for some families, however many Travellers prefer a circular or horseshoe design as these provide a better sense of community.

26. All areas of the site should generally be allocated for a specific use, such as pitches, and roads, as open space that has no obvious purpose may be vulnerable to appropriation of a space for a purpose not intended.
27. Consultation with the Traveller community is crucial in deciding how best to proceed with the overall layout of the site. It is a key element in obtaining the trust and full support of the prospective residents at the earliest stage of the project and can help identify potential barriers and deal swiftly with subsequent consultation on individual aspects of the design as they arise.
28. There is no optimum size of site or number of pitches.⁶ Generally the size of site will depend on the individual scheme and take into account a number of factors such as need, compatibility between distinct families and health and safety issues. NIHE experience would suggest smaller sites are easier to manage and more likely to attract Travellers in compatible family units. Larger sites, on the other hand, are more economical to develop but more likely to have management difficulties and compatibility problems. However for the purposes of this Guide, no more than 6-8 pitches is the recommended number of pitches given the advantages outlined above.
29. Where a larger site is unavoidable due to clear evidence of need, local Traveller community preference and value for money, then up to 15-20 pitches can be considered. Extensions to existing residential sites may lead to authorities exceeding 20 pitches on a particular site. This may be appropriate when authorities seeks to keep families together and has had regard to the views of

⁶ ECNI's 'Outlining Minimum Standards for Traveller Accommodation' (2009) document recommends a maximum of 20 pitches on a permanent serviced site, whereas in England, DCLG's Good Practice Guide (2008) suggests a maximum of 15 pitches. Previous guidance for Northern Ireland as issued by DOE (1997) stated that sites should not be less than 6 or more than 20 pitches. The Welsh guide states generally no more than 12, but flexibility for a maximum of 15-20 or more if necessary.

existing residents and the surrounding community.

30. The creation of smaller 'closes' within a larger site for distinct, extended families should be considered to help create a sense of community and create definable space. This arrangement could also open up possibilities for facilitating inter site transfers where, for example, families may be offered the opportunity to move closer to other family members or elderly and dependant relatives where a pitch in a certain close may become available.

Site Boundaries

31. The site boundary must provide clear demarcation of the perimeter of the site so as to prevent nuisance for existing residents. The site should be contained on all sides and boundaries should take into account adjoining land uses and be designed for the safety and protection of children. This subject merits specific attention in consultation with the local Traveller community at an early stage in the design process.
32. Generally, suitable fencing of at least 1.8m high shall be provided, with planting where possible. The views of Travellers and local residents living in close proximity are important in agreeing the height of boundaries. However, a range of other boundaries may be used including low walls, hedges, earth banks and natural features. Existing walls and fences may be used if they are sound and of sufficient height. The aim should be to achieve a boundary that is sympathetic to, and in keeping with, the surrounding area. Boundaries can also be used to provide shelter for more exposed sites.
33. Where a site is to be located near an industrial area or a main road, fencing and planting may be used for screening purposes. Conversely more open boundaries may be used in residential areas so as to promote integration and inclusion with the surrounding community although the degree of integration which can be achieved will be in part governed by the degree of community cohesion already experienced in that location. A balance needs to be struck between providing privacy and security for the site residents and avoiding a sense of enclosure

through, for example, the use of high railings.

34. Measures to protect the safety of site residents from fire are of paramount importance and it is essential that a clear gap of 3 metres is provided within the inside of all site perimeter boundaries as a fire prevention measure.

Size of Pitch

35. There is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. In designing a site, account should be taken of the likely characteristics of families on the waiting list as identified in the *Travellers Accommodation Needs Assessment in Northern Ireland*.
36. ECNI's research noted that most Travellers expressed a preference for a design that would give maximum space per pitch and space for children to play.⁷ Some Travellers can have large families, for instance where members of an extended family live together. There may also be families with older children who may want one or two additional small touring caravans on the pitch as separate sleeping accommodation for older children.
37. For this reason there is likely to be much greater demand amongst these communities for large family units, and small pitches may become quickly overcrowded. Larger family sizes alongside the need for vehicles for towing caravans and for employment also create particular requirements for parking.
38. Some families may also be in possession of larger mobile homes and, where possible, pitches should be large enough to cater for this possibility. Conversely, potential residents may be single or elderly members of the community who would not need a pitch of the same size.
39. Innovative site design that facilitates growth in number of pitches on an established site should be considered where possible. For example, a horse-shoe shaped design could be amended to a circular shape to increase the number of

⁷ Outlining Minimum Standards for Traveller Accommodation, Equality Commission for N.I. (ECNI) (2009), section 6.0 at page 55.

pitches on the site. Future changes to the site should not undermine health and safety considerations, standards of proximity between pitches, emergency access routes etc.

40. Previous guidance proposed a minimum pitch size of 225m² (e.g. 12.5m wide by 18m deep)⁸, but rather than be prescriptive, it is simply recommended that a pitch is designed to accommodate the following range of amenities:

- an amenity building;
- a caravan as defined within the Caravans Act (Northern Ireland) 1963 as amended the Caravans Act (Northern Ireland) 2011;
- drying space for clothes;
- a lockable shed (for bicycles, wheelchair storage etc.); and
- parking space for two vehicles and a small garden area.⁹

41. Smaller pitches, as a minimum must be able to accommodate an amenity building, a caravan as defined within the Caravans Act (Northern Ireland) 1963 as amended the Caravans Act (Northern Ireland) 2011, drying space for clothes and parking for at least one vehicle.

42. Individual parking spaces should be a minimum of 2.4 × 4.8 metres.

43. The inclusion of a play space or grassed area on each pitch is not usually feasible and therefore space for play as part of a central and communal focal point for all site occupants is normally preferred.

44. Drainage falls must comply with current NI Building Regulations. Ideally the pitch should be level apart from drainage falls.

⁸ Design Guide for Travellers' Sites in Northern Ireland, DOE, (1997), section 4.1 at page 15.

⁹ Outlining Minimum Standards for Traveller Accommodation, ECNI, March 2009, section 6 at page 58.

Layout of Pitches

45. The layout of pitches will depend on the layout of the overall site. There will be different views about whether to have grassed areas and amenities at the front, back or side of the pitch. Discussion with the Traveller community will be useful, however developers also need to consider prospective residents' needs.
46. Each pitch should be clearly demarcated to make it clear what each individual household may occupy in return for the fee paid and their responsibilities for the pitch they occupy.
47. The boundaries between pitches also act as a fire break so grass embankments, raised plant beds or low walls, rather than wooden fences, should be considered. The aim should be to achieve a boundary that is clear, sympathetic to and in keeping with surrounding areas.
48. Pitch boundaries should provide a balance between good neighbourliness and privacy. For example fencing between pitches could be up to 1.8 metres in height, particularly where amenity buildings would otherwise be overlooked, whereas 1.2 metre high fencing around the front of the pitch will offer good surveillance of the road and the site in general.
49. Each pitch should have a secure lockable gate. This will enable pitch residents to secure their own pitches. The gates should be of a robust and pleasant design and not so imposing they act as a barrier screening off pitches completely. Gates should be at least 3.1 metres wide.

Orientation of Pitches

50. As with the settled community, site layout and design should ensure a degree of privacy for each household without inhibiting the sense of community.
51. Due regard should be given to privacy and security.
52. In designing the layout of a site enough space must be provided to permit the easy manoeuvrability of the residents own living accommodation both to the site

and subsequently on to a pitch. Account needs to be taken of a tendency for some Travellers to use a mobile home in place of the traditional caravan.

53. Some mobile homes can be up to around 20 metres in length¹⁰. In order to accommodate this, the site design should strike a balance between enabling a variety of accommodation to be catered for and making best use of available space. Access roads and the site design should provide sufficient space for the manoeuvrability of average size caravans of up to 15 metres in length with capacity for larger mobile homes on a limited number of pitches where accessibility can be properly addressed in the light of the land available.

54. In addition to the movement of families on and off the site, site residents will sometimes wish to change the caravan accommodation they own and this movement can sometimes cause problems when boundary fences or gates do not allow for this. This could be overcome by the use of movable fencing and gates adjacent to the roadside which are capable of short term removal.

Site Access and Roadways

55. Access to the site should have good sightlines. Good sightlines are essential, as caravans on tow will be entering and leaving the site at various times. Public roads should have clearly displayed signs requesting cars to slow down for site access. Transport NI will be consulted on applications by the relevant council as the planning authority.

56. The width of the internal access roadway should normally be adequate for 2-way traffic and be not less than 5.5 metres wide. The design must allow caravans on tow to be positioned on pitches and adequate turning space must be provided in cul-de-sac layouts. However where the area of a site is restricted, consideration may be given to other design approaches, e.g. one way loops and 'pull-in areas' for internal roads. In any event, sufficient space must be allowed for manoeuvring caravans into and out of pitches and for access and egress of the emergency

¹⁰ The dimensions of a caravan (or mobile home/park home/timber sectional building) must not exceed 20m length, 6.8m width and 3.05m internal height if it is to fall within the definition of a caravan under the Caravans Act (Northern Ireland) 1963 as amended by the 2011 Act.

services.

57. A stretch of internal access roadway immediately adjacent to the site entrance should be of adequate width to allow, for example, 2 lorries to pass each other safely, and of adequate length to cater for caravans on tow entering or leaving.
58. A ramp or similar device will be required near the entrance to the public road in order to ensure a reduction in speed of vehicular traffic. Consideration must also be given to the use of such ramps at other locations within the site.
59. Good quality roads which are capable of withstanding heavy vehicles should be constructed. Although roads on sites do not require adoption, all roads should be constructed to adoptable standards to avoid future maintenance costs from increased wear and tear due to frequent movement of heavy vehicle. Normally concrete or tar macadam on a suitable sub-base appropriate to soil conditions is preferable.

Access for Emergency Vehicles

60. It is essential that sites are designed so that appropriate turning and reversing requirements of emergency vehicles are incorporated. Access requirements for emergency vehicles are covered under the current Northern Ireland Building Regulations and detailed within Section 6 of Technical Booklet E. This may impact on the number of pitches permitted. Good practice from recognised sources is outlined in the paragraphs below which can be used as a starting point prior to discussions with local emergency services.
61. In designing a site, all routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning. Emergency vehicles should have access to within 45 meters¹¹ (hose route) of any building or a caravan/trailer, where the 45m distance should be to a door giving access to the interior. Cable overhangs must meet the current statutory

¹¹ NI Building Regulations: Technical Booklet E (Fire Safety) 2012, 6.19 (b) (i).

requirements¹² but should generally not be less than 4.5metres above the ground. Vehicular access and gateways must be at least 3.1 metres wide and have a minimum clearance of 3.7 metres.¹³

62. Roads must not be less than 3.7 metres wide or if they form part of a one way traffic system, 3 metres wide. One way systems should be clearly sign posted. To increase potential access points for emergency vehicles more than one access route into the site is recommended.

Children's Play Area

63. A safe communal recreation / play area for children of all ages is recommended on site where suitable provision is not available within reasonable walking distance from the site on a safe route or using easily accessible public transport. For larger sites, specially designated play areas with play equipment should be considered in close liaison with the local council. Ideally, these should be designed in consultation with children and parents, to ensure equipment is provided that will be well used.

64. Where recreation areas are provided it is important to ensure they are designed and located with the safety of children in mind (taking into account the proximity of busy roads) and allowing for supervision. Warning signs should be placed at the entrance to the site and throughout warning drivers of the presence of children.

65. Any designated play area should be flexible, adaptable, varied and interesting. Providing features such as shrubs or sand will promote good quality play. Any equipment should meet normal local Council standards. Play areas should be well lit and designated as dog free areas.

66. Locating play areas in secluded areas of the site and near boundary perimeters is

¹² Model Standards for Caravan Sites in England, DCLG, (2008).

¹³ Designing Gypsy and Traveller Sites- A Good Practice Guide, DCLG, (2008).

not favoured as children could be subject to outside harassment and the play area and equipment open to vandalism. Perimeter fencing should be included to ensure children are safe from site traffic and to prevent dumping or use for scrap storage.

Car parking

67. A key element for the site is the provision of adequate parking space for residents' use. Car parking spaces must be a minimum of 2.4 x 4.8 metres each. Resident parking should be provided for on individual pitches but a site should also contain additional parking facilities for visitors as parking on the roadside could otherwise impede access of fire and other emergency services. Separate parking areas may present security considerations for residents and should therefore be situated in sight of residents generally.

Site Security

68. Site design should aim to show due regard to security and privacy. Site layout should maximise natural surveillance enabling residents to easily oversee all areas of the site. Scheme specific advice on security provision for the site should be obtained from the PSNI Crime Prevention Design Advisor (CPDA) for the area and reference should be made to 'Secured by Design' standards to inform detailed planning of the site.

69. Site layout can play an important role in avoiding a sense of enclosure and isolation amongst Travellers. The aim should be to 'design out' crime and social exclusion and 'design in' community safety and social inclusion through openness of design, allowing ease in passing through, whether walking or driving. Care also needs to be taken to ensure the safety of residents and children where car traffic passes through.

70. Before pursuing this approach however, prospective residents should be consulted at the outset to ascertain the level of community cohesion already

prevalent in the area and to establish the degree to which those who are to live on the site are comfortable with this approach and if it meets the degree of privacy and security that is acceptable.

71. It is important to provide clear delineation of public communal areas such as play areas and private space with boundaries that indicate clearly where individual pitches begin and end. It is recommended that communal areas without a clear usage are avoided in the design as they may attract vandalism, fly tipping or unauthorised caravans.

72. It is recommended that local needs and preferences are taken into account as well as the requirements of DfI Roads and fire and rescue services when designing the entrance to the site. Many Travellers are in favour of controlled access to sites, for example using a lockable gate. Such controls can prevent unauthorised parking and caravans on site. Gates can however hinder access for emergency services, postal deliveries and refuse collection.

Landscaping

73. Site landscaping that provides a mix of durable, hard landscaping (paved or concrete areas) with some good quality, soft landscaping (grassed areas, shrubs and trees) should ideally be provided. The landscaping should be designed throughout for low maintenance, and thought should also be given to preventing it from being used for unauthorised parking or unauthorised pitching of caravans. Consultation with Travellers on the provision of soft landscaping is essential as a preference for hard surfacing has been expressed by some Travellers.

74. Landscaping opportunities within and on the edge of the site should be used to create an attractive environment that can enhance resident satisfaction and pride with the site, encouraging participation with management to maintain their surroundings.
75. Planting should prove more successful if provided within a few large areas instead of in scattered patches throughout the site, although soft landscaping can be used to ensure spatial separation which prevents the movement of caravans to positions which would breach fire safety distances from the adjoining pitch.
76. Including artistic features on site could be an ideal opportunity for existing residents or potential residents to celebrate Traveller culture and identity. If this is to be considered, consultation with existing or potential residents should take place at an early stage. It is important any feature is agreed in partnership with residents. This would be a good opportunity to get Traveller children involved in the design and development of artistic features on site, particularly if there is a children's play area.

Hard Standing

77. Each pitch must include a hard standing area constructed of concrete or a similar suitable hard wearing material which extends over the whole area to be occupied by a touring caravan or other vehicle. The use of stoning should be avoided. These standings must be constructed in accordance with the industry code of practice and project a sufficient distance outwards to enable occupants to enter and leave safely. The base must be sufficient to bear the load placed on it by the home or vehicle and its contents, and the anticipated level of vehicle movement.
78. Experience indicates that Travellers have a preference for a bitumen finish to all areas of the site due to a greater life expectancy. Nevertheless, ideally hard-standing should be part of the landscape design and the pitch width need not be entirely paved. Where agreed, pitches could be designed to break monotonous design with soft landscape and where this is adopted in the design, consideration should be given to the inclusion of a storage facility on each pitch for residents to

keep equipment to maintain it.

79. The site provider/owner should consider the environmental impact of the site and measures that might be taken to improve sustainability. For example, the inclusion of separate identifiable containers for the collection of recyclable waste and provision of water butts is recommended.

Site Facilities

Amenity Building

80. It is essential for an amenity building to be provided on each service site pitch. This should have a floor area of at least 25m² and can be a detached or semi-detached design if across two pitches. The amenity building should normally be a traditionally constructed permanent building,¹⁴ however the use of modern methods of construction (MMC), such as prefabricated pods, should be considered where there are clear benefits in terms of cost, maintenance, security, etc.
81. The amenity building must include as a minimum hot and cold water supply, electricity supply, a separate toilet and hand wash basin, a bath/shower room, a kitchen with sink drainer and worktop, and a dining area. The access to the toilet should be through a lobbied area or by separate access direct from the pitch. The amenity building must also include secure storage space for harmful substances/medicines, enclosed storage for food, brooms, washing and cleaning items and space with wiring/plumbing/drainage for connection of a cooker, fridge/freezer and washing machine.
82. The inclusion of a day/living room in the amenity building for family meals, and for children and young people to play and study is recommended. The day/living room could be combined with the kitchen area to provide a kitchen/dining/lounge area. It is desirable that the day/living room should not be part of essential

¹⁴ In this context the term 'traditionally constructed' refers to masonry cavity wall construction.

circulation space, nor contain essential storage.

83. The design and construction of amenity buildings must meet the requirements of the current Building Regulations, the Institution of Electrical Engineers (IEE) regulations, the NI Water and DfC Design Standards. Materials used must comply with the relevant British Standards and Codes of Practice and provide for durable and low maintenance buildings. Its design should be sympathetic to local architecture, be attractive and of a domestic nature taking account of the relevant planning considerations.
84. Wall and floor finishes should have a high standard of durability. Particular attention should be paid to matters such as ease of maintenance and cost over its lifespan. Plumbing should be concealed as far as possible.
85. It is recommended that amenity buildings incorporate cost effective energy efficiency measures. Layout and construction should be designed to maximise energy conservation and the use of passive solar gain. All mechanical and electrical systems should be as energy efficient as possible.
86. Consideration should be given to the insulation of plumbing systems, the use of low energy light fittings and appropriate heating and ventilation systems. Any opportunity for using energy from renewable sources should be considered.
87. Adequate and sensibly situated electrical outlets, switching and controls should be installed throughout the amenity building.
88. Economical heating systems should be installed throughout the amenity building that provide temperature controls suitable for room use, and capable of being individually controlled in each room. The overall heating, ventilation and insulation strategy must take into account the potential risk of condensation, mould growth etc. due to low usage.
89. The width of main entrances, doorways and passageways must comply with current NI Building Regulations to ensure mobility standards. Fixtures and fittings in the amenity building should be domestic but robust.

90. In line with standards for social housing, other recommended features include:

- Sill heights in living/dining area no higher than 800mm above floor level;
- Hot water taps to baths/showers with a thermostatically controlled supply;
- Adequate screening and wall tiling where showers are provided over baths;
- A worktop-cooker-sink-worktop sequence that is not broken by doors, passageways or tall units;
- A 1.2 metre run of worktop between the cooker and the sink;
- A 500 mm minimum worktop each side of the cooker and wall units set back minimum 100 mm;
- A space for additional equipment such as a microwave;
- Walls in bathrooms and WCs designed to take support aids;
- Smoke/fire and heat detectors and;
- A carbon monoxide detector.

Other on site facilities.

91. The standards for site facilities applied by NIHE on serviced sites is through the provision of pitch specific facilities, following a resident centred approach.

92. The provision of a communal building is recommended within the Equality Commission for Northern Ireland's *Outlining Minimum Standards for Traveller Accommodation* document.¹⁵ The NIHE report that Communal facilities do not work as practice has indicated in a number of sites in Northern Ireland. Nevertheless, provision of a communal building could be considered on sites large enough for a diverse community of residents rather than one extended family, where need has been explored in consultation with the Travellers to be accommodated and where a site is isolated from local facilities either by distance or a lack of public transport facilities. This facility can be an important resource in

¹⁵ Outlining Minimum Standards for Traveller Accommodation, ECNI, March 2009, Page 88.

sustaining a more remote site, offering an opportunity for visits by health visitors, youth workers and education services as well as use by site management and residents alike.

93. Any such building should include:

- A community room
- Toilets (male and female)
- A kitchenette.

Ideally it should be situated towards the front of the site, accessible to all the community not just site residents and if promoted and managed well can help encourage good relations between Traveller and neighbouring communities.

Lighting

94. Sufficient lighting must be provided on the site to enable safe access and movement through the site at night for both pedestrians and vehicles having regard to the density and overall layout of the site. External lighting should also be provided on amenity buildings to ensure safe access. All lighting installations and fittings should be vandal and tamper proof.

95. Street lighting arrangements should be planned to minimise the risk of damage through vandalism and avoid problems of light pollution to homes on the site through light shining directly into caravans or amenity buildings. It should be planned to properly illuminate access roads and access to residential pitches.

96. Any play area for children should receive special attention in terms of appropriate lighting.

97. Consideration could be given to using three quarter length light pillars where there is a prospect the site may create light pollution for neighbouring sites.

Postal Arrangements

98. The site should be designed so that post can be delivered separately for each pitch. Each residential pitch should have a secure post box accessed by a key held by the pitch resident.
99. Experience has shown that postal deliveries to pitches can be disrupted by complaints about harassment by unrestrained dogs so the provision of an individual box at the entry to a pitch would be advisable. Where delivery to individual pitches is not possible, a 'pigeon hole' system near the entrance to the site or on a site office wall should be considered. This must have lockable individual boxes for each pitch.
100. Consultation has shown that a simple but important element in helping to avoid discrimination against the residents of a Traveller site is to allocate site and pitch addresses which are of a similar nature to those for the settled community and which do not highlight that the accommodation is site based.

Waste Disposal

101. Travellers should receive the same waste disposal arrangements as the settled community. Domestic waste disposal must be provided for each pitch in accordance with the local council requirements. A key element in designing the layout of the site is to ensure sufficient space exists for refuse collection vehicles to reach an appropriate point from which waste can be collected from individual pitches, as well as any communal refuse areas.
102. Consideration should be given to including a recycling collection point on the site where it is not in close proximity to one in the neighbouring vicinity.
103. Communal refuse areas can encourage fly-tipping and the accumulation of non-domestic waste. If a communal refuse area is necessary (in addition to refuse collection for each pitch), this should be designed and located to be convenient, accessible, robust, non-combustible and inconspicuous. It should be located away from individual pitches and from access points to the site to ensure that fire

service vehicles can enter the site and deal with any fire that might break out.

Space for Work and Animals

104. Traveller sites are essentially residential and those living there are entitled to a peaceful and enjoyable environment. Guidance on site management would therefore propose that working from residential pitches should be discouraged and residents should not normally be allowed to work elsewhere on site.
105. Paragraph 6.144 of the Strategic Planning Policy Statement (SPPS) allows for workspace to be provided 'where appropriate,' although providing areas for work on a Traveller site creates issues for health and safety, public liability, cost and management, as well as taking up valuable living space that is often not readily available. Therefore the provision of facilities for some level of activity will only be considered in exceptional circumstances where it is appropriate, having due regard to planning, environmental and health and safety considerations. However if significant commercial or other work activity is proposed and accepted, it is very important to ensure the site is delineated so that residential areas are separated from commercial or work areas.
106. This also applies to the inclusion of space for keeping animals. Where there is demand for space for animals Travellers should be encouraged to rent grazing land from neighbouring land owners if possible. The provision of space on site for keeping animals will only be provided where it is reasonable and practicable to include this.

Office premises

107. Currently in Northern Ireland there are no site managers or a requirement for an office on site as the equivalent designated officers in Northern Ireland work out of local district offices. **Further detail at Section 13.** However if this changes and an office is required for a larger site, this should ideally be in a location which can be easily found by visitors- preferably at the front of the site to ensure that it has a

view which increases security but is not intrusive to residents. Facilities that may be needed include an office area, storage space, and kitchen and bathroom facilities.

Site Services

Scope to Provide Essential Services

108. All sites must be provided with access to mains water, electricity supply, drainage and sanitation.

Water supply

109. A mains water supply suitable for drinking must be provided for each pitch, sufficient to meet the reasonable demands of residents. Water supplies must comply with current legislation, NI Building Regulations and British Standards. Ideally water meters will be provided in amenity buildings by Northern Ireland Water and must be for domestic usage.
110. Water pressure must be sufficient to enable the use of fire hydrants by the emergency services which should be located near the front of the site.
111. Outside taps and hook up points for caravans should be provided on each pitch with internal isolation valves and suitable backflow protection for security of the water supply.

Electricity supply

112. Mains electricity to each pitch is essential, sufficient to meet the reasonable requirements of the residents, and with separate meters for each pitch. Ideally pre-paid card electricity meters will be provided in amenity buildings for each pitch by the relevant supplier and must be for domestic usage. Each Traveller household is responsible for their own electricity account.

113. Underground cabling must be adequately earthed and comply with current electrical installation regulations. Installations must be inspected annually and all electrical work carried out by competent / appropriately qualified personnel in accordance with the current IEE Wiring Regulations and to the satisfaction of Northern Ireland Electricity (NIE).

Connection points

114. Consideration may be given to providing more than one electricity and water access point on each pitch to allow for trailers to be realigned either through resident's choice, family expansion or to cater for visitors.

Gas supply

115. It is essential that gas installations, supplies and storage meet all statutory requirements, relevant standards and codes of practice. Storage facilities that comply with health and safety regulations for Liquid Propane Gas cylinders must be provided. As the guidance on storage is complex, the site provider/owner should seek advice from local environmental health services. It is essential any mains gas installation is inspected annually and certified as safe.
116. Provision of a mains gas supply is recommended for amenity buildings on pitches and, if supplied, must comply with current gas installation regulations.

Oil fired central heating

117. Installations for oil fired central heating should meet current NI Building Regulations together with appropriate storage and safety arrangements in case of oil leaks.

Drainage

118. Surface water and storm water drainage must be installed. All drainage must accord with current legislation, Building Regulations and British Standards. This should be given early consideration in both site selection and scheme design.
119. It is recommended that gully and manhole covers are robust and secure. If individual caravans are connected to the drainage system the connections must be capable of being sealed when not in use.
120. Smaller drain covers could be considered as these can assist in preventing foreign objects becoming accidentally lodged in soakaways and gulleys.
121. Traveller sites may offer opportunities for implementing a Sustainable Drainage Systems approach for dealing with surface water management where surface water runs off to either natural water courses or municipal systems.
122. Consideration should be given to the inclusion of interceptors to ensure protection against petrol, oil and other substances entering the surface water drainage system.¹⁶

Sewerage

123. Sewerage for permanent sites should normally be through mains systems.
124. Each pitch should be connected to a public mains sewer when it is economic to do so. In some locations this may not be possible and in that case alternative arrangements can be made, such as a properly constructed and regulation compliant, sealed septic tank sewage system. Consent to Discharge must be sought from the Northern Ireland Environment Agency (NIEA) where it is proposed to discharge from a septic tank to a waterway, or underground stratum. All sanitation provision must accord with current legislation, NI Building

¹⁶The purpose of an interceptor is to separate water coming from the drainage system from any contaminants picked up on-route such as oil, silt, dirt and brake dust. Petrol interceptors intercept oil and petrol contained in the storm water runoff from hard standing

Regulations and British Standards.

125. Consideration should also be given to additional waste disposal connections from resident caravans to avoid problems over unauthorised connections.

DRAFT

Health, Safety and Accessibility

Risk assessment

126. It is essential that site owners undertake a general Health and Safety risk assessment of the site during the initial stage.

Fire Safety

127. It is essential that consultation with Northern Ireland Fire & Rescue Service takes place at a very early stage of designing a site so that appropriate fire safety measures can be incorporated. Good practice from recognised sources is outlined in the paragraphs below which can be used as a starting point prior to discussions with local emergency services.
128. To ensure fire safety it is essential that every caravan must be not less than 6 metres from any other caravan that is occupied separately.
129. Other structures are allowed in the separation zone if they are made of non-combustible materials (such as a brick built amenity building), as long as they do not impede means of escape.
130. As part of the overall health and safety risk assessment it is imperative that site owners carry out a fire risk assessment of the site during the initial design stage, which includes the homes on the site.
131. It should pay particular attention to those at special risk, such as children, and must include consideration of any dangerous substance liable to be on the site. A fire risk assessment will help identify the risks that can be removed or be reduced and to decide the nature and extent of the general fire precautions.
132. The significant findings of such an assessment should always be recorded.
133. General fire precautions include measures to reduce the risk of fire on the site and the risk of the spread of fire on the site.

- (a) Pitches should be no more than 30 metres from a fire point. Fire points must be housed in a weatherproof structure, easily accessible and clearly and conspicuously marked 'Fire Point'. A clearly written and conspicuous notice should be provided and maintained at each 'Fire Point' to indicate the action to be taken in the case of fire including details of a muster point. Notices should comply with BS 5499-2 - Fire safety signs, notices and graphic symbols.
 - (b) Water standpipes, hydrants or fire extinguishers should be provided on each site as determined by the risk assessment and as informed by consultation with the local fire officer. All equipment should conform to relevant British/European standards.
 - (c) A means of raising the alarm in the case of fire should be provided at each fire point. This must be appropriate to the size and layout of the site and informed by consultation with the local fire officer.
 - (d) All alarm and firefighting equipment should be installed, tested and maintained in working order by a competent person. All equipment susceptible to frost should be suitably protected.
134. The level of necessary safety (or service) must be dictated by the findings of the risk assessment.

Emergency Telephone

135. An emergency telephone for calling the emergency services should be provided particularly in areas where the mobile phone reception is poor.
136. If required, the telephone should be immediately accessible and a notice by the telephone should include the name, address and postcode of the site.

Accessibility

137. All private or communal buildings on the site must be provided to mobility standards as specified within the current NI Building Regulations. Developers

must also have regard to the Disability Discrimination Act 1995, as amended by the Disability Discrimination (NI) Order 2006, both when designing the site and during refurbishment planning.

138. When considering the extent to which pitches, parking spaces and amenity buildings should be suitable for wheelchair users, reference should be made to local Traveller Accommodation Needs Assessments. The *2014 Travellers' Accommodation Needs Assessment in Northern Ireland* confirmed that a high proportion of Traveller households (46%) had a household member with a disability or health problem that limited their day-to-day activity.
139. Where no need has been identified it is recommended that at least one pitch per site be constructed to meet the needs of a disabled resident as a contingency for future demand. Where provided, these should be consistent with the standards for housing for wheelchair users as set out in the Department for Communities' Design Standards as detailed in the Housing Association Development Guide.

Transit Sites

The Site

140. **Site Location / Selection** - The guidance for permanent sites largely also applies except that the proximity to community facilities is primarily in respect of the need for access to schools. The presence of children on the site, and potential health and safety risks for them and other residents should receive equal consideration
141. **Relationship to Surrounding Land Use** – The guidance for serviced sites applies.
142. **Health and Safety Considerations** – The guidance for serviced sites applies.

Site Design

143. **Number of pitches** – no more than 6-8 pitches is the recommended number of pitches on a site. In exceptional circumstances where larger sites are proposed, the number of pitches should not normally exceed 15-20.
144. **Site boundaries** – The guidance for serviced sites applies
145. **Size of pitch** - Wherever possible each pitch should be of a size sufficient to accommodate two touring caravans, two parking spaces and private amenities.
146. **Layout of pitches** – The guidance for serviced sites applies
147. **Orientation of pitches** – The guidance for serviced sites applies.
148. **Site access and roadways** - – The guidance for serviced sites applies
149. **Access for emergency vehicles** – The guidance for serviced sites applies.
150. **Emergency Telephone** – Details of the nearest available telephone for contacting the emergency services should be included on an adjacent fire notice in areas where the mobile phone signal is poor.
151. **Car Parking** - It is recommended that parking space for at least two vehicles is provided on each individual pitch at a minimum size of 2.4m x 4.8m each.
152. **Site Security** – The guidance for serviced sites applies.
153. **Landscaping** - The guidance for serviced sites applies although soft landscaping on transit sites can be more difficult to maintain. As these sites are only intended for short stays there is less need for soft landscaping but the general ambience of the site should be maintained to a limited and cost effective degree.
154. **Hard Standing** – The guidance for serviced sites applies.

Site Facilities

155. **Private amenities** - The provision of private amenities on each pitch including a toilet, wash hand basin and shower with hot and cold water supply is essential.
156. Depending on the degree of usage, portable facilities may be provided to meet these needs and these should be well managed and maintained. Where sites are empty for lengthy periods and to avoid vandalism to facilities these should be removed until the site is reoccupied. Permanent waste and water points should be in place to reduce the cost of use of contractors to manage the facilities.
157. **Lighting** – The guidance for serviced sites applies.
158. **Waste disposal** - Waste disposal for individual pitches is recommended. Communal refuse disposal should be provided which is convenient (but away from pitches and associated dwellings), fenced off, robust and inconspicuous.
159. **Sluice** – Provision of a sluice should be considered on each site.
160. **Laundry facilities** – consideration should be given to the provision of washing and cleaning facilities e.g. deep sinks/space for washing machines.
161. **Space for Work and Animals** – The guidance for serviced sites applies.

Site Services

162. **Water supply** – The guidance for serviced sites applies
163. **Electricity supply** - The guidance for serviced sites applies although in practice a central electricity supply administered by the site management may be provided which would entail residents paying by meter.
164. **Gas supply** – Mains gas supplies are not applicable to transit sites.
165. **Drainage** – The guidance for serviced sites applies
166. **Sewerage** – The guidance for serviced sites applies.

Health and Safety Considerations

167. **Risk Assessment** – The guidance for serviced sites applies.

168. **Fire Safety** – Please refer to Section 6 of the Northern Ireland Fire & Rescue Service (NIFRS) Caravan Site Operators Guide which can be accessed under Fire Safety Guides at the following link.

<https://www.nifrs.org/fire-safety/dhssps-fire-safety-risk-assessment-documents/>

169. **Accessibility** – The guidance for serviced sites applies.

Emergency Halting Sites

The Site

Site Location / Selection

- 170. Emergency halting sites should provide safe and convenient access to road networks and cause minimum disruption to surrounding communities.
- 171. When considering the suitability of different sites, the potential presence of young children and any risks from adjoining land uses must be considered.

Site Layout, Access and Orientation

- 172. It is important to provide markings or barriers to encourage residents to park safely, allow access for emergency vehicles and enable maximum use of the site in accordance with its intended capacity and fire safety standards. Particular regard must be given to the need to ensure a safe distance between trailers/caravans and other structures made of combustible materials. Emergency Halting Sites Stopping places should be designed to ensure there is a separation of 6m between trailers/caravans to reduce the risk of fire spread.
- 173. The road to and from the site must be of sufficient quality and size to enable access onto and off the site by heavy vehicles such as trailers.
- 174. There must be a clear barrier around the emergency stopping place to prevent unauthorised expansion of the site. Boundaries to be in keeping with surrounding area.

Site Facilities and Services

- 175. It is essential for a cold water supply to be provided for the use of site residents which may be by use of water standpipe or water bowser.
- 176. Appropriate number of portable toilets must be provided and there must be separate provision for men and women. Consideration should also be given to the provision of portable showers.

177. It is essential for a sewerage disposal point to be provided.

178. Refuse disposal facilities must be provided.

Health and Safety Considerations

179. The guidance for serviced sites applies.

DRAFT

Consultation

Introduction

180. Effective and meaningful engagement with Travellers, and liaison with the local community from the initiation of a proposal through to completion, is essential for a successful, integrated and sustainable development. Issues requiring discussion include: site selection, design features, facilities and services, management and maintenance of sites and provision of accommodation other than through serviced or transit sites.

181. This guidance is not intended to replace local consultation with Travellers and other key agencies. Local consultation should include:

- Travellers from the communities whose needs will be met on the site, including if possible, the families who will move onto the site at first let;
- Northern Ireland Fire & Rescue Service;
- The Police, for advice on site security;
- The local Transport NI Division;
- The local council, including the planning department from the very first stages of site identification;
- Local residents & businesses;
- Local Education , Local Health and Social Care Officers; and
- Designated officers & maintenance Officers.

182. The same principles apply to consultation on Traveller sites as with other refurbishment projects and new developments. Very few architects and developers will have first-hand experience of living on a site as part of a Traveller community, and consultation with Travellers will be crucial to ensuring the site works successfully.

183. The needs and preferences of those who will live on the site should be given full consideration and should be met as far as is possible within available resources. People who have lived on sites for most or all of their lives are in the best position to advise on what works well and what doesn't for a particular community. However, the needs of those people who will move onto the site at first let will need to be balanced with the needs of those who may live on the site at a later date.

When to consult?

184. Travellers and/or their relevant representative bodies should be consulted throughout all stages of the design process, including site identification through the NIHE. Local communities can be aware of factors which, despite site shortages, could prevent take up of site places in particular areas.

Methods of consultation

185. The NIHE (NIHE) has an established record of joint working with the Traveller community following the development and publication of the Travellers' Accommodation Needs Assessments in Northern Ireland 2008 and 2014. It is recommended that Housing Associations wishing to work with Travellers for the first time, consult with the NIHE at the outset to secure its own introductions.
186. Where difficulties remain, introductions can usually be secured through other organisations which already have a good working relationship with members of the Travellers community and their representative organisations.
187. Participation will be greatly improved by holding the consultation in familiar and informal surroundings that are easy to get to, comfortable and warm. The office of a local organisation working with Travellers, or a local community building might be appropriate for instance.
188. It is important that consultation does not rely on written methods such as leaflets, surveys or feedback forms. Face to face consultation which enables Travellers to influence rather than just respond to the consultation agenda is important. Provision of models and computer generated images of proposed site

development will also help prospective residents visualise the outcome and help identify useful refinements which may not otherwise be immediately apparent.

189. In some cases it may be appropriate to use a small number of people from the communities to represent their interests, however there is a danger with this type of approach that the perspective of some parts of the community will be missed. There is also a risk that many Travellers are reticent about representing their whole community, instead preferring to speak on behalf of their own family.
190. It would be beneficial to ensure as far as possible that sympathetic and knowledgeable architects and contractors are employed in the site design process. At an early stage the NIHE could offer an 'awareness raising' session on Traveller culture involving representatives of the local Traveller community. This would be a means of opening dialogue and facilitating ongoing consultation with prospective residents, which is necessary to ensure the successful design and construction of the site and achieve best value for the money.
191. The timing of the consultation will be important. For instance women are more likely to be able to take part in consultation that takes place on sites during the day (and outside school pick up hours) whereas men may be more likely to be able to attend evening meetings.
192. One to one interviews are one method of consulting, but they can be time-consuming and do not provide an opportunity to attempt to resolve differing opinions. Focus groups can be a good way to encourage discussions around matters where there are differing perspectives and where there is a need to achieve a consensus position. If some tensions between different members of the community are anticipated then small meetings or group discussions will work better than large meetings.
193. *An Assessment of Travellers' Accommodation Needs in Northern Ireland*, which is published periodically by the NIHE, gathers views on site design and satisfaction with existing sites. The information contained within this report should be drawn upon and added to the knowledge base.

Feeding back on the results of consultation

194. As a common courtesy the results of any consultation should always be fed back to the individuals and/or communities concerned. Where it has not been possible to meet the expressed preferences of the community the reasons for this should be clearly explained.
195. Once the site has been developed, this consultation process offers the basis of a permanent residents' forum, which can help sustain a good co-operative spirit of consultation between the NIHE and residents which is a key element in managing a site successfully.

Consulting with the settled community

196. As for other kinds of development, it is important that members of the local community, whether Travellers or settled residents, are able to feed in views on plans for new sites.
197. Misinformation and limited contact between Travellers and the settled community can feed distrust and misconceptions, and these must be challenged and addressed proactively. Opposition from the settled community can delay, and in some cases prevent, the issue of planning permission for new sites. The right of any individual to comment on any development proposal is central to the functioning of a fair and open planning system and should be protected and facilitated at all costs.
198. It will be important to demonstrate the need for new site provision in any consultation with the settled community, and the steps that the NIHE will take to address concerns and deal with problems should they arise.

Management Standards

199. Successful places are safe, well maintained and well managed. Achieving this depends on managing the physical assets effectively and appropriately. With the right management structures, people who live and use the place will be able to influence what happens there. The success of developments is sustained by active support and resources that enable them to function effectively.
200. Across the range of accommodation types, respectful and sensitive management in conjunction with effective maintenance is essential for ensuring the long term sustainability of a Traveller development and can also be a critical success factor in building the support of the local community for a Traveller site.
201. To help local communities accept authorised sites, they will need to see that provision in their area is proportional to need and matched by provision in other areas; and that sites are managed in a way that avoids, or remedies quickly, any negative impact on neighbouring areas.
202. It is recommended that, from the beginning, a site management and maintenance plan is in place along with sensible, transparent rules around allocation of pitches. This will help ensure residents live in a safe and secure environment. The plan should be flexible and pay particular attention to the involvement and participation of site residents in the management and maintenance of the site. In addition the plan should have regard to best practice in housing management guidelines.
203. There are no specific legal requirements for the management of Traveller sites in Northern Ireland. However the principles of effective management of accommodation apply in a similar fashion to Traveller sites as to other forms of social housing, and these are set out below.

- Ownership of responsibility for site management should be clear, whether this is NIHE or, in future, contracted out to a housing association, a private company, a voluntary or community organisation or to Travellers living on site.
- It is recommended that each site should have a designated officer who can be contacted by residents as necessary. The designated officer would be a member of the local district office staff in which a particular site is located. Good practice suggests that some residents should be invited to take part in the recruitment of the designated officer. The designated officer may have responsibility for a number of sites, and where this is the case, or where the officer does not live on site, regular visits – at least twice a week – should be made to the site.
- The designated officer should familiarise him/herself with the families living on a site, through direct engagement with residents, with the licensing agreement, payment procedures, etc. The designated officer should play a proactive role in the management of the site and be visible to residents and approachable.
- The designated officer has a central role in preserving health and safety standards on site. This must be carried out proactively, and in discussion with residents, who should know and understand the benefits of measures in place to protect their health and safety.
- The publication of an *Allocations Policy* presented in oral and written form to residents, is an important step in building trust between residents and management. Allocation of pitches should not take place informally, but should follow the terms of the allocations policy to ensure fairness in approach. An appeals process should be available to residents who wish to challenge a decision.
- It is recommended that site residents are consulted when deciding management arrangements. Residents should be invited and encouraged to play a central role

in the way the site is run. Travellers should be asked about their preferred methods of consultation, and these should be accommodated wherever possible.

- Effective and efficient repair and maintenance is a central obligation on site management, and will play an important role in the smooth operation of the site. A contact number should be provided for residents to report faults either to their own pitches or communal areas. A management plan should have a programme of planned maintenance as well as contingencies for reactive maintenance. A clear management structure should be included and relevant contacts in appropriate departments identified.

ANNEX A

KEY DOCUMENTS

- Caravans Act (Northern Ireland) 1963 as amended the Caravans Act (Northern Ireland) 2011 - An Act to amend the law relating to caravans and caravan sites.
<http://www.legislation.gov.uk/nia/2011/12/contents>
- Disability Discrimination Act 1995, as amended by the Disability Discrimination (NI) Order 2006. <http://www.legislation.gov.uk/ukpga/1995/50/contents>
- Design Guide for Travellers Sites in Northern Ireland, 1997, Department for the Environment. This document can be obtained from the NICS Library.
[https://nigl.ent.sirsidynix.net.uk/client/en_GB/default/search/detailnonmodal/ent:\\$002f\\$002fSD_ILS\\$002f0\\$002fSD_ILS:28249/one?qu=design+guide+for+travellers&te=ILS](https://nigl.ent.sirsidynix.net.uk/client/en_GB/default/search/detailnonmodal/ent:$002f$002fSD_ILS$002f0$002fSD_ILS:28249/one?qu=design+guide+for+travellers&te=ILS)
- Race Relations (Northern Ireland) Order 1997- Where Irish Travellers were specifically identified as a racial group protected against unlawful discrimination.
<http://www.legislation.gov.uk/nisi/1997/869>
- Northern Ireland Act 1998- Specifically section 75 which requires Public Authorities to promote equality of opportunity between persons of different racial groups.
<http://www.legislation.gov.uk/ukpga/1998/47/contents>
- DOE New Policy on Accommodation for Travellers 1999- Although the responsibility for Traveller accommodation remained within the remit of local Councils this policy gave the NIHE a more strategic role. <https://www.communities-ni.gov.uk/sites/default/files/publications/dsd/report-of-the-working-party-on-travellers-accomodation.pdf>
- Promoting Social Inclusion Working (PSI) Group on Travellers Report 2002- Highlighted the various needs of the Traveller community and helped push their issues higher up the Governments agenda. Office of the First Minister and Deputy First Minister responded to this report in *A Response to the PSI Working Group Report on Travellers*. <http://www.equality.nisra.gov.uk/travellers.pdf>
- Housing (Northern Ireland) Order 2003 - Led to the transfer of 6 sites from local Councils and gave NIHE responsibility to both manage and provide suitable accommodation, including transit sites.
<http://www.legislation.gov.uk/nisi/2003/412/contents/made>

- Unauthorised Encampments (Northern Ireland) Order 2005 - NIHE now deal with all reported Unauthorised Encampments in conjunction with PSNI under a joint protocol.
<http://www.legislation.gov.uk/nisi/2005/1961/contents>
- Outlining Minimum Standards for Traveller Accommodation, March 2009, Equality Commission for Northern Ireland
http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/Traveller_Accommodation-Outlining-Minimum-Standards.pdf
- Designing Gypsy and Traveller Sites- Good Practice Guide, May 2008, DCLG
<https://www.gov.uk/government/publications/designing-gypsy-and-traveller-sites-good-practice-guide> (withdrawn on 1st September 2015)
- Model Standards 2008 for Caravan Sites in England Caravan Sites and Control of Development Act 1960 – Section 5, Communities and Local Government
- <http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/housing/pdf/modelstandards2008.pdf>
- Regional Development Strategy 2035, *Building a Better Future*, March 2012, Department for Regional Development (RDS) now the Department for Infrastructure (DfI). <https://www.infrastructure-ni.gov.uk/publications/regional-development-strategy-2035>
- All-Ireland Travellers Health Study, September 2010, University College Dublin.
<http://www.ucd.ie/news/2010/09SEP10/030910-shorter-life-expectancy-and-higher-suicide-rates-among-Travellers-study-shows.html>
- Planning Policy for Traveller Sites, DCLG, March 2012 was revised and replaced by Planning Policy for Traveller Sites, August 2015.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf
- Travellers Accommodation Needs Assessment 2014, NIHE.
http://www.nihe.gov.uk/traveller_accommodation_needs_assessment_2014_published_march_2015.pdf
- Designing Gypsy and Traveller Sites- Guidance, May 2015, Welsh Government.
<http://gov.wales/docs/ds/jlg/publications/equality/150528-designing-gypsy-and-traveller-sites-en.pdf>

Additional Copies

Additional copies of this document can be obtained from:

Supported Housing Branch
Housing Supply Policy
Level 3 Causeway Exchange
1-7 Bedford Street
Belfast
BT2 7EG

Tel: 028 90515020

Email: supported.housing@communities-ni.gov.uk

Mid Ulster District Council

By email: info@midulstercouncil.org

Housing Division
Level 3
Causeway Exchange
1-7 Bedford Street
BELFAST
BT2 7EG

7 June 2019

Dear Sir/Madam

The Department for Communities has responsibility for publishing and maintaining a Design Guide for Travellers' sites in Northern Ireland, which is a technical guidance document. The current Design Guide was published by the former Department of the Environment (NI) in 1997. The Department has now completed a comprehensive review and produced an updated draft Design Guide, which is being shared with you as a consultee as part of a focused consultation process (**Annex A**).

The Design Guide for Travellers Sites in Northern Ireland is a purely technical document. It is intended to support the provision of appropriate, cost effective facilities for Travellers living in Northern Ireland. This guide should be considered in the development of new sites and for sites that have to be substantially redeveloped. It seeks to outline the key issues, including the relevant planning context, that must be considered and identify the main design and management elements necessary to create high quality and sustainable Traveller sites which meet residents' traditional and cultural needs. The Northern Ireland Housing Executive (NIHE) has the strategic role in provision of accommodation for Travellers.

The deadline for the submission of comments on this consultation document will be 31 July. Respondents are asked to submit their views as early as possible to allow time for consideration. All responses not submitted electronically must be made in

writing and your name, address and council name should be clearly stated. Contact details for responses are below.

Yours sincerely,



DAVID POLLEY

DIRECTOR OF HOUSING SUPPLY POLICY & DELIVERY

CONTACT DETAILS

Supported Housing Branch

3Rd Floor, Causeway Exchange

1-7 Bedford Street

Belfast

BT2 7EG

E mail responses should be sent to

Supported.Housing@communities-ni.gov.uk

If you require further information or wish to discuss the Design Guide with Department officials please contact us and a meeting can be organised.

The Department will publish a summary of the responses following completion of the consultation process, in line with the Freedom of Information Act 2000 (Confidentially of Consultations). More information about the Freedom of Information Act is at **Annex B** of this email.

Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality between all the Section 75 groups. Without prejudice to these obligations, the Department is also required in carrying out its functions relating to Northern Ireland, to have due regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial groups. Equality screening of the Design Guide for Travellers' Sites in NI has identified no

adverse impacts. On this basis, the decision is that the Design Guide for Travellers' Sites in NI should not be subject to a full equality impact assessment.

Annex A



DRAFT Design
Guide for Travellers

Annex B

FREEDOM OF INFORMATION

Freedom of Information Act 2000 – Confidentiality of Consultations

The Department will publish a summary of responses following completion of the consultation process. Your response and all other responses to the consultation, may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

The Freedom of Information Act gives the public a right of access to any information held by a public authority, namely the Department in this case. This right of access to information includes information provided in response to a consultation. However, the Department does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- the Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- the Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature; and

- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner's Office (or see web site at: <http://www.informationcommissioner.gov.uk/>).

Email: environmentalhealth@midulstercouncil.org

PB/

19th June 2019

Mr David Polley
Director of Housing Supply & Delivery
Department for Communities
Housing Division
Supported Housing Branch
Level 3 Causeway Exchange
1-7 Bedford Street
Belfast
BT2 7EG

Dear Mr Polly,

Consultation on Design Guide for Travellers' Sites in Northern Ireland

Mid Ulster District Council (MUDC) welcomes the opportunity to comment on the Department's reviewed and updated Design Guide for travellers' sites in NI. Meaningful consultation with travellers and the local community regarding site location and design is important. Location should take into consideration surrounding land uses in relation to noise and disturbance for the travellers and surrounding communities. Any proposed workspaces within the sites should provide suitable protection for residents and surrounding communities from noise or other potential environmental issues.

Clarification is sought that serviced sites would have individual amenities available for permanent sites and not be reliant on communal amenity buildings. Clarification is sought as to why a Transit Site, which the only difference from a Serviced Site appears to be that it is smaller, requires each pitch to be provided with private amenities such as a toilet; wash hand basin and shower, and is not required to have a communal amenity building.

Transit sites refer to caravans being parked on a temporary basis. The term temporary can be interpreted differently and should be defined to ensure that there is not longer term residency with limited amenities.

The section on private amenities suggests that portable facilities may be provided. MUDC would support having in place individual or communal amenities rather than portable ones.

MUDC recommends the inclusion of example site layouts and diagrams of amenity units, which would be helpful in demonstrating layouts and how the key considerations have been taken into account i.e. plot sizes; car parking; landscaping; amenity building; children's play; storage; services and waste collection etc. Consideration of pitch size should be considered in light of the Welsh design guide.

In addition to the footnote on Page 10, MUDC would welcome further clarification on the definition of a caravan in relation to modular homes on Traveller's Sites.

Overall, it is essential that there is consistency and compatibility with the terminology and approach contained within the draft Design Guide and associated guidance documents, with the draft new Model Licence Conditions and NIFRS Fire Safety Guide for Caravan Site Operators.

Yours sincerely,

Model Licence Conditions 2019

Caravans Act (Northern Ireland) 1963 Section 5



Department for

Infrastructure

An Roinn

Bonneagair

www.infrastructure-ni.gov.uk

Product Code:

ISBN:



© Crown copyright 2019

Introduction

1. The use of land as a caravan site is controlled by relevant planning legislation, whereas the physical standards and layout, amenities and other standards within the site are controlled by a site licence issued by local councils under the Caravans Act (Northern Ireland) 1963 (“the 1963 Act”). Section 5 of the 1963 Act enables councils to set licence conditions.
2. Under section 5(7) of the 1963 Act the Department may from time to time specify model conditions with respect to the lay-out and the provision of facilities, services and equipment for caravan sites or particular types of caravan site; and that, in deciding what (if any) conditions to attach to a site licence, the council shall have regard to any conditions so specified.
3. These conditions revise and update the Model Licence Conditions for Caravan Sites 1992 and Model Licence Conditions Residential Caravan Sites 1994 and apply to all caravan sites:
 - permanent residential caravan sites;
 - holiday caravan sites;
 - touring caravan sites; and
 - Traveller or Roma sites.
4. This review has been prompted by the Northern Ireland Human Rights Commission (NIHRC) ‘Out of Sight, Out of Mind: Travellers’ Accommodation in NI’ investigation report published on 6 March 2018. The report made a number of recommendations for public authorities including that the Department should:

“review the legal and policy framework concerning site licences. This should include the development of a model site licence setting out the minimum standard of provision and safety requirements for each type of Travellers site in NI, along with enforcement powers for any breach.”
5. While addressing the report’s recommendation the Department has also taken the opportunity to amalgamate the current Model Licence Conditions for holiday caravan sites as well as residential caravan sites into one document, creating greater clarity and ease of reference for councils and stakeholders. In parallel

and in response to a recommendation by NIHRC, the Department for Communities has completed its review of the Design Guide for Travellers' Accommodation 2019, and will be consulting shortly. The Design Guide is intended to support the provision of appropriate, cost effective sites for Travellers living in Northern Ireland.

6. Although the conditions remain largely unchanged there are some key revisions regarding emergency telephones and fire safety measures.
7. These conditions should be considered when:-
 - applying licence conditions to new sites;
 - applying licence conditions to sites that have been substantially redeveloped; or
 - renewing or reviewing a current licence.
8. Where current licence conditions are adequate in serving their purpose, the council do not need to apply new conditions.
9. Where it is appropriate to amend an existing condition or apply a new condition to a licence the council must be able to justify its reasons for doing so, having regard to all the relevant circumstances of the site. In deciding whether to apply a new condition the council must have regard to the benefit that the condition will achieve and the interests of both residents and site owners (including the cost of complying with the new or altered condition) and should consult the site licence holder on the proposed variations. They may also wish to consult with residents or a Residents' Association, where appropriate.
10. The model conditions represent those standards normally to be expected as a matter of good practice on caravan sites. They should be applied with due regard to the particular circumstances of the relevant site, including its physical character, any relevant services, facilities or other amenities that are available within or in the locality of the site and other applicable conditions.
11. The council should also consider the Northern Ireland Fire and Rescue Service guidance¹ and the Department for Communities Design Guide for Travellers

¹ "NIFRS Fire Safety Guide for Caravan Site Operators", available via NIFRS website at www.nifrs.org

when applying conditions on a site licence.

12. The explanatory note to this document provides advice on the application and enforcement of the model conditions when considering attaching conditions to licences.

13. Councils should allow a reasonable period of time after any site licence alteration for compliance with the revised conditions, unless the reason for making the alteration is to address a matter requiring immediate attention.

14. When considering taking enforcement action councils should undertake a risk assessment to take into account all possible factors in relation to the prosecution.

15. This document should be referred to as Model Licence Conditions 2019.

Interpretation

16. In the model conditions any references to “site” includes a park home site (including a mobile home site) and to “caravan” includes a mobile or park home.

17. In this document the term “site owner” is referred to throughout, as normally that person would be the licence holder.

THE MODEL CONDITIONS

1. The Boundaries and Plan of the Site

- (i) The boundaries of the site from any adjoining land should be clearly marked by a man made or natural feature.
- (ii) No caravan or combustible structure should be positioned within 3 metres of the boundary of the site.
- (iii) A plan of the site should be supplied to the council upon the application for a licence and, thereafter whenever there is a material change to the boundaries or layout of the site, or at any other time on the demand of the council.
- (iv) The plan supplied must clearly illustrate the layout of the site including all relevant structures, features and facilities on it and should be of suitable quality.

2. Density and Spacing Between Caravans

- (i) Subject to the following variations the minimum spacing distance between any two caravans should not be less than 6 metres in permanent residential caravan sites, touring caravan sites and Traveller or Roma sites. On holiday caravan sites the minimum spacing should not be less than 5 metres between caravans made of aluminum or 6 metres between those made of plywood or similar skin. Where there is a mixture of holiday caravans of aluminum and plywood the separation distance should be 6 metres.
- (ii) The point of measurement of porches, awnings etc. is the exterior cladding of the caravan, excluding the draw bar. The distance from any part of a caravan to any part of a road within the site should not be less than 2 metres.
- (iii) Porches may protrude 1 metre into the 5 or 6 metres space and should be of the open type.
- (iv) Where awnings are used, the distance between any part of the awning and an adjoining caravan should not be less than 3 metres. They should not be of the type which incorporates sleeping accommodation and they should not face each other or touch.

- (v) Eaves, drainpipes and bay windows may extend into the 5 or 6 metre space provided the total distance between the extremities of 2 adjacent units is not less than 4.5 metres in a 5 metre space, or 5.25 metres in a 6 metre space.
- (vi) Where there are ramps for disabled, verandahs or stairs extending from the unit, there should be 4.5 metres (3.5 metres on holiday caravan site which has holiday caravans only) clear space between them and such items should not face each other in any space. If they are enclosed, they should normally be considered as part of the unit and, as such, should not intrude into the 5 or 6 metres space.
- (vii) A garage, a shed or covered storage space should be permitted between units only if it is of substantially non-combustible construction (including non-combustible roof) and sufficient space is maintained around each unit so as not to prejudice means of escape in case of fires. Windows in such structures should not face towards the unit on either side. Car ports and covered walkways should in no circumstances be allowed within the 5 or 6 metres space. For cars and boats between units see paragraph 12.
- (viii) The density should be consistent with safety standards and health and amenity requirements. The gross density should not exceed:-
 - 50 caravans per hectare in permanent residential caravan sites and Traveller or Roma sites
 - 60 caravans per hectare in holiday caravan sites; and
 - 75 caravans per hectare in touring caravan sites;calculated on the basis of the usable area (i.e. excluding lakes, roads, communal services and other areas unsuitable for the siting of caravans) rather than the total site area.

3. Roads, Footpaths, Pavements, Gateways and Overhead Cables

- (i) Roads and footpaths should be designed to provide adequate access for emergency vehicles.
- (ii) Emergency vehicle routes within the site should be kept clear of obstruction at all times.
- (iii) New roads should be constructed and laid of suitable bitumen macadem or concrete with a suitable compacted base.
- (iv) All roads should have adequate surface water/storm drainage.

- (v) New two way roads should not be less than 3.7 metres wide, or if they are designed for and used by one way traffic, not less than 3 metres wide.
- (vi) One-way systems should be clearly signposted.
- (vii) Where existing two way roads are not 3.7 metres wide, passing places should be provided where practical.
- (viii) Vehicular access and all gateways to the site must be a minimum of 3.1 metres wide and have a minimum height clearance of 3.7 metres.
- (ix) Roads and footpaths should be maintained in a good condition.
- (x) Cable overhangs must meet the statutory requirements.
- (xi) Every caravan should be connected to a road by a footpath with a hard surface.
- (xii) Where practicable, communal footpaths and pavements should not be less than 0.9 metres wide.

4. Lighting

- (i) Taking into account the needs and characteristics of a particular site, roads, communal footpaths and pavements should be adequately lit between dusk and dawn to allow the safe movement of pedestrians and vehicles around the site during the hours of darkness.

5. Bases

- (i) Every unit must stand on a concrete base or hard-standing.²
- (ii) The base must extend over the whole area occupied by the unit, and must project a sufficient distance outwards from its entrance or entrances to enable occupants to enter and leave safely. The hard standings must be constructed to the industry guidance, current at the time of siting, taking into account local conditions.

6. Maintenance of Common Areas, including Grass, Vegetation and Trees

- (i) Every part of the site to which the public have access should be kept in a clean and tidy condition.
- (ii) Every road, communal footpath and pavement on the site should be

² Councils should refer to paragraph 25 in the Explanatory Notes in respect of holiday/touring sites.

maintained in a good condition, good repair and clear of rubbish.

- (iii) Grass and vegetation should be cut and removed at frequent and regular intervals.
- (iv) Trees within the site should (subject to the necessary consents) be maintained.
- (v) Any cuttings, litter or waste should be removed from the immediate surrounds of a pitch.

7. Supply & Storage of Gas etc.

- (i) Gas (including natural gas) and oil installations, and the storage of supplies should meet current statutory requirements, relevant Standards and Codes of Practice.
- (ii) Liquefied Petroleum Gas cylinders must not be positioned or secured in such a way as to impede access or removal in the event of an emergency.

8. Electrical Installations

- (i) On the site an electricity network of adequate capacity should be installed to meet safely all reasonable demands of the caravans and other facilities and services within it.
- (ii) The electrical network installations are subject to regulation under current relevant legislation and must be designed, installed, tested, inspected and maintained in accordance with the provisions of the current relevant statutory requirements.
- (iii) Any work on electrical installations and appliances should be carried out only by persons who are competent to do the particular type of work being undertaken, in accordance with current relevant statutory requirements.
- (iv) Any work on the electrical network within the site should be done by a competent person fully conversant with the appropriate statutory requirements.

9. Water Supply

- (i) All pitches on the site should be provided with a water supply sufficient in all respects to meet all reasonable demands of the caravans situated on them.
- (ii) All new water supplies should be in accordance with all current legislation, regulations and relevant British Standards.

- (iii) All repairs and improvements to water supplies and installations should be carried out to conform with current legislation and British Standards.
- (iv) Work on water supplies and installations should be carried out only by persons who are qualified in the particular type of work being undertaken and in accordance with current relevant legislation and British Standards.

10. Drainage and Sanitation

- (i) Surface water drainage should be provided where appropriate to avoid standing pools of water.
- (ii) There should be satisfactory provision for foul and waste water drainage either by connection to a public sewer or sewage treatment works or by discharge to a properly constructed septic tank or cesspool approved by the council.
- (iii) All drainage and sanitation provision should be in accordance with all current legislation and British Standards.
- (iv) Work on drains and sewers should be carried out only by persons who are qualified in the particular type of work being undertaken and in accordance with current legislation and British Standards.
- (v) For caravans without their own water supply and water closets, clean and properly maintained communal toilet blocks should be provided, with adequate supplies of water, to at least the following scales:-
 - Men: 1 WC and 1 urinal per 5 caravans or less;
 - Women: 2 WCs per 15 caravans or less;
 - 1 wash basin for each 2 WCs (or urinals).
- (vi) Toilet blocks should be sited conveniently so that all site occupants may have reasonable access to one by means of a road or footpath.
- (vii) On holiday and touring caravan sites, where laundry facilities are not available, at least one deep sink with adequate supplies of hot and cold water should be provided.

11. Refuse Storage & Disposal

- (i) Where communal refuse bins are provided these should be housed within a properly constructed bin store.
- (ii) All refuse disposal should be in accordance with all current legislation and regulations.

12. Parking

- (i) Private cars, jet skis and boats may be parked between adjoining caravans provided that they do not obstruct entrances to caravans or access around them and they are a minimum of 3 metres from an adjacent caravan.
- (ii) Fuel tanks for motor boats should be disconnected and stored in a shaded area, not below a caravan.
- (iii) Suitably surfaced parking spaces should be provided to meet the requirements of residents and their visitors.

13. Communal Recreation Space

- (i) On sites where it is practical to do so, suitable space equivalent to about one tenth of the total area of the site should be allocated for recreational purposes, unless in the council's opinion there are adequate recreational facilities within a close proximity to the site.

14. Notices and Information³

- (i) The name and address of the site should be displayed on a sign in a prominent position at the entrances to the site together with the current name, address and telephone number of the licence holder and manager and emergency contact details.
- (ii) In addition, the following should be available for inspection in a prominent place on the site:-
 - a copy of the current site licence
 - a copy of the most recent periodic electrical inspection report.
 - a copy of the site owner's certificate of public liability insurance.
 - a copy of the local flood warning system and evacuation procedures, if appropriate.
 - a copy of the fire risk assessment made for the site (if required by the NIFRS Caravan Sites Operators Guide).
- (iii) A current plan of the site with roads and pitches marked on it should also be prominently displayed at the entrances.
- (iv) All notices should be suitably protected from the weather and from direct

³ Councils should refer to paragraph 67 in the Explanatory Notes when applying Conditions 14(ii) and (iii) in respect of NIHE sites.

sunlight, preferably in area lit by artificial light.

15. Emergency Telephone

- (i) An emergency telephone for calling the emergency services is only required if mobile phone reception in the area is poor.
- (ii) If provided, the telephone should be immediately accessible and a notice by the telephone should include the name, address and postcode of the site.

16. Flooding

- (i) The site owner should establish whether the site is at risk from flooding by referring to the Department for Infrastructure's Flood Maps.
- (ii) Where there is risk from flooding the site owner should consult the Department for Infrastructure (Rivers) for advice on the likelihood of flooding, the depths and velocities that might be expected, the availability of a warning service and on what appropriate measures to take.

17. Fire Safety Measures⁴

Fire Points

- (i) These points should be located so that no caravan or site building is more than 30 metres from a fire point. Equipment provided at a fire point should be housed in a weather-proof structure, easily accessible and clearly and conspicuously marked "FIRE POINT".

Fire Fighting Equipment

- (ii) All fire hydrants should conform to the current British Standard.
- (iii) Access to hydrants and other water supplies should not be obstructed or obscured.

Fire Warning

- (iv) A suitable means of raising the alarm in the event of a fire should be provided at each fire point on permanent residential caravan sites, holiday caravan sites and touring caravan sites.

⁴ Councils should consider the "NIFRS Fire Safety Guide for Caravan Site Operators", available via NIFRS website at www.nifrs.org. See paragraph 75 of explanatory notes.

Maintenance and Testing of Fire Fighting Equipment

- (v) All alarm and firefighting equipment should be installed, tested and maintained in working order by persons who are qualified in the particular type of work being undertaken and be available for inspection by, or on behalf of, the licensing authority or the Fire and Rescue Service.
- (vi) A record should be kept of all testing and remedial action taken.
- (vii) All equipment susceptible to damage by frost should be suitably protected.

Fire Notices

- (viii) A clearly written and conspicuous notice should be provided and maintained at each fire point to indicate the action to be taken in case of fire. This notice should include the following:

“On discovering a fire:

- I. Ensure the caravan or site building involved is evacuated.
- II. Raise the alarm.
- III. Call the fire brigade (the nearest phone is sited at).”

In applying the conditions above in respect of fire safety measures the council should refer to NIFRS Fire Safety Guide for Caravan Site Operators. As regards to Traveller/Roma sites the guidance emphasises that in the event of a fire the occupier should Get Out, Get the Fire and Rescue Service Out, and Stay Out and therefore the provision of fire points, fire fighting equipment or a fire warning is not recommended.

Annex to Model Licence Conditions 2019 for Caravan Sites in Northern Ireland: Explanatory Notes

INTRODUCTION	13
LEGAL BACKGROUND	14
THE BOUNDARIES AND PLAN OF THE SITE	16
DENSITY AND SPACING BETWEEN CARAVANS	16
ROADS, FOOTPATHS, PAVEMENTS, GATEWAYS AND OVERHEAD CABLES.....	17
LIGHTING	19
BASES	19
MAINTENANCE OF COMMON AREAS, INCLUDING GRASS, VEGETATION AND TREES.....	20
SUPPLY AND STORAGE OF GAS ETC.	20
ELECTRICAL INSTALLATIONS.....	21
WATER SUPPLY	21
DRAINAGE AND SANITATION	22
REFUSE STORAGE AND DISPOSAL.....	23
PARKING	23
COMMUNAL RECREATION SPACE.....	24
NOTICES AND INFORMATION	24
FLOODING.....	25
FIRE SAFETY MEASURES.....	26

MODEL LICENCE CONDITIONS – EXPLANATORY NOTES

Introduction

1. These explanatory notes are designed to be read in conjunction with Model Licence Conditions 2019 in Northern Ireland (“the conditions”) and are intended to offer guidance on the application and enforcement of the conditions for councils.
2. The Model Licence Conditions as laid out represent what would normally be expected as a matter of good practice on such sites. They should be applied with due regard to the particular circumstances of each case, including the physical character of the site, any facilities or services that may already be available within convenient reach and other local conditions.
3. It is recognised that not all sites will easily be able to meet the Model Licence Conditions in every case due to their particular characteristics, but a council will need to be able to justify any decision not to have regard to the Model Licence Conditions in setting a licence condition.
4. The Model Licence Conditions are not intended to be the “ideal”; councils may in the circumstances set more demanding ones if it is appropriate and can be justified.
5. There will be some licence conditions which require inter and cross agency input and advice from other teams within the council and outside organisations, such as the Health and Safety Executive Northern Ireland, the Northern Ireland Fire and Rescue Service, Northern Ireland Water and the Northern Ireland Environment Agency. It is important for all parties concerned with sites that effective lines of communication are established to ensure that any problems are identified and resolved as early as possible.
6. Disability Discrimination legislation applies to sites and this should be borne in mind when framing licence conditions and considering possible enforcement action. Guidance can be found at www.nidirect.gov.uk and this can also help councils in their consideration of licence conditions. Further guidance can also be found on the Equality Commission's website at <https://www.equalityni.org>.

Legal background

7. Under the 1963 Act, most privately owned sites must be licensed by the council, unless exempted under the 1963 Act⁵. A licence will be granted unless the applicant does not have relevant planning permission to operate the site or has had a licence revoked in the last three years.⁶
8. The council may attach conditions to the licence, but these can only relate to the physical use of the site and its management⁷. The Department for Infrastructure may issue Model Licence Conditions which the council must have regard to in deciding what conditions to attach to a licence⁸. The council may from time to time alter a site licence condition (either of its own volition or upon the application of the licence holder)⁹.
9. A licence holder may appeal against the imposition of a condition in a licence or any proposed alteration to a condition or a refusal to alter a condition¹⁰.
10. It is an offence to breach a licence condition and on summary conviction the offender can currently be fined up to £2,500¹¹. Where a condition requires works to the site to be carried out and these are not done either within the time specified or to the satisfaction of the council, the council may carry out the works itself and recover from the licence holder any expenses it has reasonably incurred in doing so¹².
11. The council may apply to the court to have a licence revoked if the licence holder has been convicted on two or more occasions of breaches of licence conditions¹³.
12. The council is required, under section 22 of the Act, to maintain an accurate register of the site licences in their area. Given the number of different types of sites that councils may deal with, it is recommended that the register

⁵ Section 2 and Schedule to the 1963 Act set out in which circumstances a site licence is not required.

⁶ Section 3 (3) and (6).

⁷ Section 5 (1) to (6). For restriction see *Mixnam's Properties v Chertsey UDC A.C. 735*.

⁸ Section 5 (7).

⁹ Section 8.

¹⁰ Sections 7 and 8 (2).

¹¹ Section 9 (1). The maximum penalty on summary conviction is a fine not exceeding level 4 on the standard scale.

¹² Section 9 (4).

¹³ Section 9 (2).

shows what type of site each is, be it holiday, residential, mixed use or Traveller. It is recommended as a minimum the information the site register has is:

- Name and address of site (if available the Geographic Information Service mapping code should also be logged)
- Name of the licence holder, the site owner (if different) and any person managing the site on behalf of either of those persons
- Type of site
- The number of pitches
- The licence conditions (if any)

DRAFT

The Boundaries and Plan of the Site

1. The boundary should clearly define the limit of the site owner's responsibility. The boundary should be suitably marked and properly maintained. This boundary could be formed of a fence, hedge, wall or natural feature or any other suitable structure (or any combination of these) or it may in whole, or part, be formed by an appropriate natural feature, such as a river or a wood. It would not normally be appropriate for that natural feature to simply include an open field.
2. Plans of the site should be provided to the council at the site owners' expense.
3. It is best practice for copies of the plan to be made available to the emergency services.
4. The 3 metre separation distance inside the boundary serves the purpose of ensuring privacy from whatever is on the other side of the boundary, such as a road, and other developments, such as houses etc. This may not be necessary given the particular characteristics of the site.
5. The 3 metre separation distance measurement should be taken from the caravan wall.

Density and Spacing Between Caravans

6. The 5 or 6 metre separation distance is required for two reasons:
 - Health and safety considerations; and
 - Privacy from neighbouring caravans.
7. Health and safety matters, such as the positioning of gas bottles, etc. should also be taken into account.
8. For the purposes of calculating the distance between the caravans, the point from which measurements are taken is the exterior cladding of the relevant caravan. Eaves, drainpipes, gutters, sills, threshold, door canopies and bay windows should be discounted.

9. Porches should not render the home incapable of being moved, which means they should be demountable.
10. If structures, other than garages, are on pitches within the separation distance and are of a combustible construction, then the council should consider allowing sufficient time for them to be replaced with an acceptable non combustible model.
11. At no time should a garage constructed of combustible material be allowed in the separation distance.

Enforcement

12. In considering the enforcement of the separation distance the council should refer to the Northern Ireland Fire and Rescue Service guidance. It should also seek the views and take account of representations from the site owner and affected residents before taking any steps to enforce this condition, where practicable.
13. Before the council undertakes any enforcement action it should consider the benefit of the works against the potential impact on the residents' enjoyment of their caravans and the cost to the site owner.

Roads, Footpaths, Pavements, Gateways and Overhead Cables

14. Roads should be constructed of bitumen macadam or concrete with suitable compacted base. However, sites with roads constructed of tarmac should not be required to automatically upgrade their roads. The roads should only be required to be upgraded as and when they begin to fall into disrepair.
15. Some larger sites may have traffic calming measures such as speed humps on their roads. Though not specifically covered in this standard, it will be worth ensuring that any legal requirements applying to un-adopted roads are met. Guidance and assistance can be found on the Department for Infrastructure website, www.infrastructure-ni.gov.uk.
16. Gateways, roads and turnings should have enough clearance to allow safe entry for emergency vehicles and new units on lorries. The widths and heights

given are based on the maximum sizes of emergency vehicles that may regularly attend incidents on sites.

17. In determining the permitted height of cable overhangs the council must take into account the current statutory requirements. Those applying as at the date of this guidance are found in the Electricity Safety Quality and Continuity Regulations (Northern Ireland) 2012 SR 2012/381 (ESQCR). These regulations provide that, in general, cables should not overhang a road at a height of less than 5.8 metres for lines not exceeding 33KV.

18. The Technical Specification (TS) published by the Energy Networks Association (ENA) [“ENA TS 43-8”](#) specifies that where:

- The overhead line follows a route along a hedgerow, fences, boundary walls or similar features, the minimum clearance in these circumstances is 4 metres.
- The overhead line crosses a driveway with an access width of no more than 2.5 metres (and the driveway is defined by gateposts or similar features), the minimum clearance is 4.3 metres.

Further advice on minimum clearances is available from the Health and Safety Executive Northern Ireland.

19. It is good practice that all overhead lines on sites should be fully insulated and where a cable is within easy reach of a property; it must be so and protected from interference.

20. Where the site owner generates their own electricity, the council should require the site owner to comply with regulation 3 of the ESQCR and in considering any enforcement action in relation to cables must consult with the HSENI.

21. Communal path widths should normally be 0.9 metres in respect of new sites or sites that are undergoing substantial redevelopment (including expansion to part of the site); otherwise paths of not less than 0.75 metres should be accepted where they already exist.

Lighting

22. The lighting provided for communal paths and roads should be adequate to allow safe movement around the site during the hours of darkness. Many sites use low lighters rather than traditional street lamps and these work well as long as they are well maintained and plants/vegetation are not allowed to grow around them and stop them emitting light effectively. The lighting must be fit for purpose i.e. to allow vehicles and pedestrians to navigate around the site between dusk and dawn.

Bases

23. It is important to note that the construction, maintenance and repair of the concrete base are the responsibility of the site owner. New bases should be laid as a minimum in accordance with the current industry guidelines.

24. Particular attention should be paid to the terrain of the site before a base is laid, which may mean a thicker base is needed. The base should be sufficient to handle the load placed upon it by the caravan and its contents.

25. On holiday caravan sites and touring caravan sites hard standings may not be necessary if the caravans are removed during the winter or if the ground on which they are situated is firm and safe in poor weather conditions.

Enforcement

26. When considering any enforcement action, the council should also seek the views and take account of representations from the site owner and affected residents before taking any steps to enforce this standard, where practicable.

27. Before the council undertakes any enforcement action it should consider the benefit of the works against the potential impact on the residents' enjoyment of their homes and the cost to the site owner.

28. Where a caravan has to be removed in order to facilitate works to the base the council should normally, if it is feasible and if it is the resident's wish, require the site owner to reinstate, at his own expense, the caravan on the original pitch on completion of the works.

Maintenance of Common Areas, including Grass, Vegetation and Trees

29. Cut grass and vegetation should be removed from the site as soon as practicable. Bonfires should not be used as a means of disposal. Vegetation is often used for sight screening but should be kept at a reasonable height.
30. Trees on the site will normally be the responsibility of the site owner. Where trees are in need of care and maintenance the council should, before any action is taken, liaise with the officer responsible for trees at the council to ensure that all statutory and other requirements are complied with.
31. The common parts of the site (including roads, paths and pavements) must be kept free of any rubbish and maintained in a clean and tidy condition. The council may wish to consider whether appropriate receptacles for litter need to be provided in such areas. In any case the site owner should be required to make arrangement for the regular collection of routine rubbish from the site. They should also be required to make arrangements for the prompt disposal of waste and other materials which accumulate on the site during any works etc. Secure non combustible facilities should be provided on the site for the proper storage of rubbish and waste prior to its removal and disposal off the site.

Supply and Storage of Gas etc.

32. The Health and Safety Executive Northern Ireland ("HSENI") website, www.hseni.gov.uk, provides details and information about the various legislative requirements and contacts if further information is needed. In addition the trade body for LPG suppliers, uklpg, www.uklpg.org, also has information which may be of use.
33. Anyone being employed by a site owner to carry out work on gas (including natural gas) or oil installations should be suitably qualified to do the work. The [HSENI](#) pages contain details of various certification schemes which may apply.

Enforcement

34. In considering whether to take enforcement action for a breach of site licence conditions officers should liaise with the HSENI to ensure any action taken by the authority is not in conflict with any action the HSENI is proposing to take.

35. Council officials who identify areas of concern on sites should always consult the HSENI about the problem(s).

36. All new installations must be to the current regulations and maintained at that standard.

Electrical Installations

37. The electrical installations on the site will be a distributor's network either belonging to the regional electricity network operator or the owner of the site. The Department for Economy's website: www.economy-ni.gov.uk contains information on legislation regarding the electricity supply in Northern Ireland.

38. A suitably qualified person for the purpose of carrying out work on electrical installations and appliances, including maintenance and inspections, includes a professionally qualified electrical engineer, a member of the Electrical Contractors Association, a contractor approved by the National Inspection Council for Electrical Installations Contracting, or a qualified person acting on behalf of the above.

39. It may be necessary to ensure the electricity distribution network complies with ESQCR, in which case such work should only be undertaken by a competent person familiar with those Regulations.

40. All new installations must meet the requirements of the current regulations and maintained at that standard.

Enforcement

41. In considering whether to take enforcement action for a breach of site licence conditions, officers should liaise with the HSENI to ensure any action taken by the authority is not in conflict with any action the HSENI are proposing to take.

42. Council officials who identify significant areas of concern with site electrical networks and installations should always consult the HSENI about the problem(s).

Water Supply

43. The Utility Regulator lays down service standards for Northern Ireland Water ("NI Water") and details can be found on its website at www.uregni.gov.uk. In addition,

there are various schemes for suitably qualified persons and authorities should check to see that those undertaking works are qualified. The main scheme is run by NIC certification and details can be found about the scheme at www.niceic.com

44. Where the water supply is wholly or partially supplied from a private water supply such a supply should be registered with the Drinking Water Inspectorate before use. Further information can be obtained from <https://www.daera-ni.gov.uk/articles/private-water-supplies> .

45. On any site of two or more caravans the site owner must consult with NI Water in respect of installing a water supply to the site.

Enforcement

46. With the majority of well-established sites enforcement of this section will need to be carefully handled, as most sites will have long established water systems. As with gas and electricity above, there may be a case for dual enforcement if an offence is identified. Consultation with NI Water and the Drinking Water Inspectorate for Northern Ireland within the Department of Agriculture, Environment and Rural Affairs is essential.

47. As with the previous sections, council officers who identify an issue with water supply on a particular site may wish to advise NI Water and the Drinking Water Inspectorate for Northern Ireland of the problem.

48. All new installations must be to the current regulations and maintained at the appropriate standard.

Drainage and Sanitation

49. As with water supplies, provision of sewerage facilities is overseen by the Utility Regulator.

50. It is important that all drains and sewers are well maintained and are connected to the appropriate system. If left unchecked, there can be consequences for the health of residents, along with those who live near the site.

51. Where the proposed site is serving multiple caravans, those constructing must consider the requirements of Article 161 of the Water and Sewerage Services

(Northern Ireland) Order 2006, as amended, with regards the construction and adoption of sewers serving two or more units.

52. It should be noted that the environmental quality of drainage is regulated by the Northern Ireland Environment Agency, with whom the council must consult about any problems.

53. Where appropriate, particular consideration should be given to the needs of disabled people in the provision made for water points, toilets, washing points and showers.

Enforcement

54. In considering whether to take enforcement action for a breach of site licence conditions officers should liaise with NI Water and the Northern Ireland Environment Agency to ensure any action taken by the council is not in conflict with any action NI Water or the Northern Ireland Environment Agency are proposing to take.

55. Council officials who identify areas of concern on sites should alert NI Water and the Northern Ireland Environment Agency to the possible defects.

56. All new installations must be to the current regulations and maintained at that standard.

Refuse Storage and Disposal

57. If communal bins are provided they should be housed within a properly constructed bin store. Liaison with colleagues who deal with refuse collection matters will help in ensuring that the bins provided by the site owner (in the case of communal bins) are acceptable to the council in pursuance of its collection of rubbish from them.

58. The site owner should be required to discuss with the council arrangements for the separation of waste for the purpose of recycling it, and required to provide the necessary receptacles etc. on the site.

Parking

59. Parking needs will vary considerably between individual caravan sites. Parking

requirements should reflect the reasonable needs of the residents, having regard to the size and layout of the site, the number of units, the occupation criteria of the site and the availability of public transport in the immediate vicinity.

60. Provision of parking spaces on new sites or those undergoing redevelopment or extension should be consistent with local planning policies.

Communal Recreation Space

61. This standard should only be applied if the council is satisfied that it is both practicable to provide recreation space on the site and there is insufficient recreation space off the site in the near locality.

62. It will only be practicable to provide such space on the site if there is sufficient open space which is available and it is possible to safely use that space for recreation. The standard requires the council to consider the need for recreation space; it does not require it to consider the need for recreation facilities, although the council may consider that need as part of a licence condition. The larger the site the more recreation space or spaces may be needed. On small sites there may be no need for space at all. In deciding whether it is practicable to provide the space the council should also consider the site layout, the availability of private open spaces (e.g. within the pitch), the availability of other amenities on the site (e.g. club houses) and the age and number of residents on the site.

63. On site recreation space may be considered unnecessary if there is sufficient suitable space available off site within close (walking) distance of it. The space must, however, be freely accessible by the public, such as a municipal park, commons land, and greens or any part of the countryside to which the public have a right to walk.

Notices and Information

64. It is important that all notices are protected from the weather and are prominently displayed, either on a board, in an office open to the public, or other places on the site which the residents have free and reasonable access to.

65. The notices must include the most recent site licence, and the contact details of the site manager, and if different the licence holder. This should include an out of

hours contact number for emergencies, and if available an e-mail address.

66. The site owner is also required to make available certain information for inspection by residents in a prominent position on the site. That could be the site office provided it is open at reasonable times, a community room which every resident is entitled to use and which is also open at reasonable times or a notice board located at the entrance to or in a central part of the site.

67. The council should discuss and agree a suitable arrangement in respect of the display of notices and information required by Conditions 14(ii) and (iii) with the NIHE, regarding the sites provided for Travellers.

Emergency Telephone

68. The council should decide whether an emergency telephone for calling the emergency services is required, taking account of the individual characteristics of each site including appropriate availability of mobile phone coverage and reception.

Flooding

69. It is important that if a site is in an area susceptible to flooding, procedures are in place to ensure that all those on the site are alerted quickly, and that they are aware of any evacuation procedures that may be in place. A notice should be prominently displayed with all relevant information.

70. The site should be included in any emergency arrangement plans held by councils.

71. Sites should consider surface water flood risk and how to mitigate any such risk. For those located within the inundation area of a Controlled Reservoir it would be advisable to have an evacuation plan in place.

72. Advice on flood risks is available from the Department for Infrastructure website: www.infrastructure-ni.gov.uk

73. It is important in those parts of the country where flooding is an issue that councils have effective liaison with the Department for Infrastructure Rivers Office for their area, as well as relevant officials across their own council. NI Water should also be

contacted.

Fire Safety Measures

74. The Northern Ireland Fire and Rescue Service website: www.nifrs.org contains a range of helpful information on fire safety and the requirements of The Fire and Rescue Services (Northern Ireland) Order 2006. This includes links to fire safety guides including a specific guide relating to fire safety for caravan site operators.

75. In applying any conditions relating to fire safety measures, the council should consider the recommendations made in the Northern Ireland Fire and Rescue Service guidance. For example at Traveller or Roma sites, NIFRS recommends that during meetings and site visits it should be emphasised that in the event of a fire the occupier should Get Out, Get the Fire and Rescue Service Out, and Stay Out, and therefore the provision of fire points, fire fighting equipment or a fire warning is not recommended.

76. The Fire and Rescue Service has a duty to provide fire safety advice to those who ask for it, although it will not carry out risk assessments.

Fire Fighting Equipment

77. Where fire points are advised in the NIFRS Fire Safety Guide for Caravan Site Operators they should be visible at all times and marked in a way that makes it obvious as to what they are. They will need to be kept clear of any obstructions at all times should they be needed in the event that a fire breaks out.

78. As of the date of publication of this document current guidance by the Northern Ireland Fire and Rescue Service is that a fire hydrant should be installed within 100m of any caravan standing and be capable of providing a flow rate of at least 1,500 litres per minute. Where a fire hydrant is not provided, or where the flow rate is insufficient, an alternative water supply may be acceptable, such as lake, pond, river, canal or a holding tank, provided it is capable of providing at least 45,000 litres of water at all times of the year, and to which access, space and a hard standing is available for a fire appliance.

79. The positioning of mains connected hydrants is the responsibility of NI Water, and any queries as to whether a site has a hydrant should be directed to them. The

positioning of the hydrants should be recorded on the site map, which will assist the emergency service in locating them in the event of an emergency.

80. The site operator may decide, for additional protection, to install other measures such as water standpipes and hose reels at each fire point. Where these are provided, the water pressure and flow should be sufficient to project a jet of water approximately 5m. The hose reel should be a minimum length of 30m and comply with the current British Standard.
81. Fire Extinguishers should only be used if there is not enough water pressure for a hose reel. Where provided, extinguishers should comply with the current British Standard.
82. The previous Model Licence Condition in respect of an emergency telephone has been modified. An emergency telephone for calling the emergency services is only required if mobile phone reception is poor. On touring caravan sites, site owners are encouraged to provide details of the nearest available telephone for contacting the emergency services on the fire notice.

Fire Warning

83. The means of raising the alarm in the event of a fire should be appropriate to the size and layout of the site. If you are unsure of which form of raising the alarm is the most suitable to the site, then refer to the NIFRS Fire Safety Guide for Caravan Site Operators.

Maintenance and Testing of Fire Fighting Equipment

84. It is important that all fire warning systems and firefighting equipment are regularly inspected and maintained. The suggestion is that these checks should be carried out on an annual basis. All testing and maintenance should be carried out by a person suitably qualified to do the work. Records should be kept of any testing and when the most recent inspections were carried out. The record of all tests and inspections should be kept on the site for inspection.

Fire Notices

85. The fire action notice should be displayed on a notice board, and at other suitable points around the site. The full address of the site, including the postcode should be included. Suggested text is available in the NIFRS Fire Safety Guide for Caravan Site Operators.

Enforcement

86. The main enforcer in respect of fire safety is the Northern Ireland Fire and Rescue Service.

DRAFT

DRAFT

Regional Planning Directorate



Clarence Court
10-18 Adelaide Street
BELFAST
BT2 8GB
Tel: 0300 200 7830

31 May 2019

Dear Sir/Madam

CONSULTATION ON NEW MODEL LICENCE CONDITIONS FOR CARAVAN SITES

I am writing to advise you that the Department is seeking views on draft new Model Licence Conditions for caravan sites.

The Department is proposing to revise and update the following publications:-

- Model Licence Conditions for Caravan Sites 1992; **and**
- Model Licence Conditions Residential Caravan Sites 1994.

The draft new model conditions will assist councils in deciding the conditions to attach to caravan site licences. They will apply to all caravan sites:

- permanent residential caravan sites;
- holiday caravan sites;
- touring caravan sites; and
- Traveller or Roma sites.

The draft new Model Licence Conditions may be downloaded from the Department for Infrastructure website at www.infrastructure-ni.gov.uk. Alternatively you can request a copy by telephone: 028 90540571; by email from Legislation.Planning@infrastructure-ni.gov.uk or from the postal address below.

Regional Planning Directorate
Room 1 - 08
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

E-mail: planning@infrastructure-ni.gov.uk

Website: www.planningni.gov.uk

Should you feel that a meeting would be beneficial before submitting a response, my staff would be happy to meet with you. Please contact Irene Kennedy at Irene.kennedy@infrastructure-ni.gov.uk if you wish to arrange a meeting.

The closing date for the receipt of comments is 31 July 2019.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Angus Kerr', with a stylized flourish at the end.

ANGUS KERR
Chief Planner
& Director of Regional Planning

Email: environmentalhealth@midulstercouncil.org

PB/

19th June 2019

Mr Angus Kerr
Chief Planner & Director of Regional Planning
Department for Infrastructure
Regional Planning Directorate
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

Dear Mr Kerr,

Consultation on New Model Licence Conditions for Caravan Sites

Mid Ulster District Council (MUDC) welcomes the Department's review and update of the Model Licence Conditions for Caravan Sites 1992 and Model Licence Conditions Residential Caravan Sites 1994, and for the opportunity to reply to the consultation. MUDC raises the following comments as per the numbering in the draft new Model Licence Conditions;

1. The Boundaries and Plan of the Site
 - MUDC requests clarification on why there is no longer a requirement to number each caravan stand
2. Density and Spacing Between caravans
 - MUDC welcomes the amalgamation of separation distances and density of caravans from previous Model Licence Conditions
 - MUDC requests clarification regarding the omission concerning the erection of fences around or near to individual caravans
 - MUDC requests clarification on whether the minimum spacing distance between caravans also refers to modular buildings on Travellers' sites
 - MUDC requests clarification on what would be deemed a sufficient timeframe for the relocation of structures, in order to comply with separation distances
 - MUDC requests clarification on whether LPG storage should be taken into account in regards to ensuring the prescribed spacing between caravans
 - MUDC is of the opinion that the enforcement of prescriptive spacing is significantly weakened by the consideration of residents' enjoyment and costs to the site owner, as referred to on Page 17 Para.13
3. Roads, Footpaths, Pavements, Gateways and Overhead Cables
 - No comment
4. Lighting
 - MUDC welcomes the specific addition of lighting requirements

5. Bases
 - No comment
6. Maintenance of Common Areas, including Grass, Vegetation and Trees
 - MUDC would welcome consistency of language used regarding the terms footpath and pavement
7. Supply & Storage of Gas etc.
 - MUDC requests clarification regarding the application of this requirement to Traveller's Sites
8. Electrical Installations
 - MUDC requests clarification on whether the examination of the electrical installation within a caravan, is required for caravans located on all sites i.e. Holiday and Travellers' caravan sites
9. Water Supply
 - MUDC would welcome the inclusion that it is the responsibility of the site owner to ensure the quality of workmanship being carried out on water supplies
10. Drainage and Sanitation
 - MUDC highlights the correction that approval should be sought from NIEA for the satisfactory provision for foul and waste water drainage, not the council
 - MUDC requests clarification regarding the removal of the requirement for providing hygienic disposal of sanitary towels
 - MUDC requests clarification regarding the removal of the requirement to provide artificial lighting to toilet blocks for during the hours of darkness
11. Refuse Storage & Disposal
 - MUDC requests clarification for removing the requirement to provide the facility to enable the communal bin storage area to be hosed down with clean water
12. Parking
 - MUDC welcomes the addition of separation distances
13. Communal Recreation Space
 - No comment
14. Notices and Information
 - MUDC requests clarification as to whether this should apply to Travellers' sites as they have permanent structures and residence

15. Emergency Telephone

- MUDC requests clarification regarding the provision of an emergency telephone on a Travellers' Site, and its suggested location given that fire points are not required

16. Flooding

- MUDC welcomes the specific addition of flooding risk awareness

17. Fire Safety Measures

- MUDC is of the opinion that as there is no exemption for Fire Notices on Travellers' Sites, this may be problematical to get a suitable location for display as fire points are not required

MUDC raises the following comments in relation to the Model Licence Conditions Explanatory Notes;

- Page 14 Paragraph 10: MUDC is of the opinion that enforcement actions are weakened by the contents of Paragraphs 13 & 14 on Page 3, and Paragraphs 26 & 27 on Page 19.
- Page 15: MUDC requests clarification on whether the name of the licence holder is required for Travellers' Sites
- Page 18: MUDC is of the opinion that the permitted height of cable overhangs should be dealt with primarily at the planning stage
- Page 20 Paragraph 30: MUDC is of the opinion that a council may not have an officer responsible for trees
- Page 21 Paragraph 39: MUDC would welcome the inclusion that it is the responsibility of the site owner to ensure the electricity distribution network complies with the relevant regulations
- Page 22 Paragraph 47 & Page 23 Paragraph 55: MUDC would welcome consistency in language used regarding "may wish to advise" and "should alert" NI Water regarding issues or areas of concern
- Page 25 Paragraph 66: MUDC recommends reviewing the reference to a site office/community room which is unlikely to be available at Travellers' Sites.

It is essential that there is consistency and compatibility with the terminology and approach contained within the draft new Model Licence Conditions and associated guidance documents, in particular the draft new Design Guide for Travellers' Sites in Northern Ireland. and the NIFRS Fire Safety Guide for Caravan Site Operators.

Yours sincerely,